U.S. DEPARTMENT OF COMMERCE
National Technical Information Service
PB-285 589

Proposed Issuance of a New Source National Pollutant Discharge Elimination System Permit to Ideal Basic Industries, Inc. Cement Plant, Theodore Industrial Park, Alabama, and Limestone Quarry, Monroe County, Alabama

(U.S.) Environmental Protection Agency, Atlanta, Ga. Region IV

Sep 78

PB 285 589

EPA 904/9-78-018

FINAL ENVIRONMENTAL IMPACT STATEMENT IDEAL BASIC INDUSTRIES

CEMENT PLANT
THEODORE INDUSTRIAL PARK, ALABAMA
AND LIMESTONE QUARRY
MONROE COUNTY, ALABAMA

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30308

REPRODUCED BY
NATIONAL TECHNICAL
INFORMATION SERVICE
U. S. DEPARTMENT OF COMMERCE
SPRINGFIELD, VA. 22161

BIBLIOGRAPHIC DATA SHEET

1. Report No.
EPA 904/9-78-018

2.

3. Recipient's Accession No.
PB285589

4. Title and Subtitle
Final Environmental Impact Statement for Ideal Basic Industries

5. Report Date
September 1978

6.

7. Author(s)
EIS Preparation Section, EIS Branch, EPA Region IV

8. Performing Organization Rept. No.

9. Performing Organization Name and Address
EIS Branch, EPA, Region IV
345 Courtland Street, N.E.
Atlanta, GA 30308

10. Project/Task/Work Unit No.

11. Contract/Grant No.

12. Sponsoring Organization Name and Address
Same as box 9

13. Type of Report & Period Covered
Final EIS

14. 994/88

15. Supplementary Notes

16. Abstracts

Ideal Basic Industries proposes to construct a new cement plant in Theodore Industrial Park near Mobile, Alabama and a supporting limestone quarry in Monroe County near Monroeville, Alabama . This impact statement presents a summary of the draft EIS, a transcript of the public hearing, response to significant comments made at the public hearing and in writing and changes in the project. Additional alternatives were considered for spoil disposal. The development of wetlands to replace wetlands altered by construction of the access corridor are also discussed. The agency decision is to proceed with issuing the NPDES permit.

17. Key Words and Document Analysis. 17a. Descriptors

Cement manufacture
Limestone quarry
Mobile Alabama
Kiln
Bayhouses
Wetlands.

17b. Identifiers/Open-Ended Terms

17c. COSATI Field/Group

18. Availability Statement

19. Security Class (This Report)
UNCLASSIFIED

20. Security Class (This Page
UNCLASSIFIED

21. No. of Pages
400

22. Price
A17-A01

FORM NTIS-35 (REV. 10-73) ENDORSED BY ANSI AND UNESCO. THIS FORM MAY BE REPRODUCED USCOMM-DC 8265-P74

EPA 904/9-78-018
NPDES Application Numbers:
AL0028801, Cement Plant
AL0028819, Limestone Quarry

9)

FINAL
ENVIRONMENTAL IMPACT STATEMENT

for

6

Proposed Issuance of a New Source
National Pollutant Discharge Elimination System Permit

to

Ideal Basic Industries, Inc.
Cement Plant, Theodore Industrial Park, Alabama
and Limestone Quarry, Monroe County, Alabama

prepared by

U.S. Environmental Protection Agency
Region IV
Atlanta, Georgia 30308

Approved:

John C. White
Regional Administrator

September, 1978
Date

REPRODUCED BY
NATIONAL TECHNICAL
INFORMATION SERVICE
U. S. DEPARTMENT OF COMMERCE
SPRINGFIELD, VA. 22161

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30308

September 1, 1978

TO: ALL INTERESTED GOVERNMENTAL AGENCIES,
PUBLIC GROUPS, AND CONCERNED INDIVIDUALS

The enclosed final environmental impact statement (FEIS) for Ideal Basic Industries, Inc. proposed cement plant and limestone quarry is hereby submitted for your review and comment. This document has been prepared pursuant to Section 102(2)(c).

Ideal Basic Industries, Cement Division has applied for NPDES permits to discharge rainfall runoff from the plant site, the uncovered raw material storage piles, diked areas around the oil storage tanks and cooling tower blowdown at the cement plant and from the rainfall catchment basins at the limestone quarry. They have applied for their other necessary federal permits, state permits and approvals.

The FEIS may be reviewed at the EPA Region IV office and also at the public libraries listed below:

Main Library, 701 Government Street, (Mobile, AL)
Cottage Hill Branch (Mobile, AL)
Monte L. Moorer Branch (Mobile, AL)
Parkway Branch (Mobile, AL)
Saraland Branch (Mobile, AL)
Toulminville Branch (Mobile, AL)
Government Information Division (Mobile, AL)
Fairhope Public Library (Baldwin County)
University of South Alabama Library (Mobile, AL)
Monroeville Public Library (Monroeville, AL)
Patrick Henry State Junior College Library (Monroeville, AL)
Monroe County High School Library (Monroe County)

The 30 day period required for a public review of the final EIS before administrative action can be taken begins on the date that the EIS was made available to EPA, Office of Federal Activities or the date of this communication, whichever is later.

Please bring this notice to the attention of all persons who would be interested in this matter.

John C. White
John C. White
Regional Administrator

i.a

TABLE OF CONTENTS

Page

SUMMARY SHEET FOR ENVIRONMENTAL IMPACT STATEMENT S-1

CHAPTER I--INTRODUCTION I-I

FEDERAL ACTIONS I-1
FORMAT AND CONTENTS I-2

CHAPTER II--STATEMENT OF FINDINGS II-1

AGENCY DECISION II-1
NEED FOR THE PROJECT II-1
AIR QUALITY II-1
NOISE II-2
SOLID WASTE II-2
WATER RESOURCES II-3
ARCHAEOLOGY II-3
ECOLOGY II-4
SOCIOECONOMICS II-5

CHAPTER III--SUMMARY OF THE DEIS III-1

INTRODUCTION III-1
PROJECT HISTORY AND SITE SELECTION III-1

PLANT SITE III-4

SITE CHARACTERISTICS III-4
PLANT LAYOUT AND CONSTRUCTION III-7
PLANT OPERATION III-10
SUMMARY OF ENVIRONMENTAL IMPACTS III-13

    Air Quality III-16
    Noise III-20
    Solid Waste III-21
    Water Resources III-22
    Archaeology III-25
    Ecology III-25
    Socioeconomics III-29

QUARRY SITE III-32

LOCATION AND CHARACTERISTICS III-32
PROJECT DESCRIPTION III-35

    Construction III-35
    Quarrying Process III-35
    Land Reclamation III-36
    Resource Utilization III-37

TABLE OF CONTENTS (Continued)

Page

SUMMARY OF IMPACTS III-38

Air Quality III-38
Noise III-41
Solid Waste III-42
Water Resources/Geotechical III-42
Archaeology III-46
Terrestrial Ecology III-47
Aquatic Ecology III-51
Socioeconomics III-53

CHAPTER IV--PUBLIC HEARING COMMENTS AND RESPONSES IV-1

TRANSCRIPT OF PUBLIC HEARING IV-1
ERRATA SHEET IV-93
WRITTEN COMMENTS SUBMITTED IV-97

H-1. George C. Wallace, Governor, State of Alabama IV-97
H-2. Bob Glass, District 105, Alabama House of Representatives IV-98
H-3. Lambert C. Mims, Mayor, City of Mobile IV-99
H-4. Joe C. McCorquodale, Jr., Speaker of the House, Alabama House of Representatives IV-101
H-5. J.E. Warren, District 93, Alabama House of Representatives IV-102
H-6. John McMillan, Jr., District 95, Alabama House of Representatives IV-103
H-7. Maryon Allen, U.S. Senate IV-104
H-8. John C. Thomason, Assistant to the President, Ideal Basic Industries IV-105
H-9. Dan Wiley, and Bay Haas, Mobile County Commission IV-110
H-10. J.A. Wintzell, Mayor, City of Bayou La Batre IV-111
H-11. G. Thornton Nelson, Alabama Power Company, Birmingham IV-112
H-12. James M. Hirs, American National Bank and Trust Company of Mobile IV-115
H-13. Douglas J. McColl, Mobile Bar Pilots Association IV-117
H-14. Ken L. Lott, Merchants National Bank of Mobile IV-119
H-15. William H. Holland, Wilson Electric Company, Inc., IV-120
H-16. Ernest W. Todd, Jr., Mobile Area Chamber of Commerce IV-121
H-17. T.B. Martenstein, Smith-Kelly Supply Co. IV-122
H-18. J. Edward Rehm, Associated Industries of Alabama, Inc., IV-123
H-19. W.M. Collins, First National Bank IV-125
H-20. R.M. Hope, Director, Alabama State Docks Department IV-126
H-21. Arthur B. Pope, Pope & Quint IV-128

TABLE OF CONTENTS (Continued)

Page

H-22. Robert E. Snetzer, Coosa-Alabama River Improvement Assn., Inc., Montgomery IV-129
H-23. Albert J. Meacham, Roberts Bros., Inc. IV-131
H-24. Ezra Trice, Southern Industries Corp. IV-132
H-25. W.C. Prater, Tillmans Corner Chamber of Commerce IV-134
H-26. Debra R. Howard, Mobile IV-135
H-27. Bert W. Milling, Underwood Builders Supply Co., Inc. IV-136
H-28. Sheldon L. Morgan, Warrior-Tombigbee Development Association IV-138
H-29. Ralph E. Whitson, Mid-Gulf Business Roundtable IV-139
H-30. E. Frank Schmidt, Industrial Development Board of City of Mobile IV-140
H-31. Peter M. Kenyon, Mobile Traffic & Transportation Club IV-146
H-32. Hartwell Ludlow, The Propeller Club IV-147
H-33. Cren Pritchett, Monroeville Area Chamber of Commerce IV-148
H-34. Otha Lee Biggs, Monroe County Commission IV-149
H-35. R.B. Williams, III, Williams Drug Store, Monroeville IV-150
H-36. Johnny Snyder, Monroe County Conservation Club IV-151
H-37. Frederick Cushing, Jr., Mobile County Wildlife and Conservation Assn. IV-152
H-38. Jean C. King, Mobile IV-154
H-39. Morris L. Sheridan, Sheridan Construction Corp. IV-155
H-40. K.C. Dufford, Louisville & Nashville Railroad Co. IV-157
H-41. Marisa Gardner, Mobile Community Organization IV-158
H-42. Norman J. Walton, South Alabama Regional Planning Commission IV-160
H-43. Norman J. Walton, J.S. Walton & Co. IV-162
H-44. Petition from residents of Monroe County: S.S. Gaillard, Fanney R. Gaillard, Agee Braoghton, Sam Nichols, Tom Perkins, Andrew J. Moore, Mazell Bryant, John Nichols IV-163
H-45. Fran Bryan, Mobile IV-164
H-46. Congressman Jack Edwards, First Congressional District, Alabama IV-165

RESPONSES TO SUBSTANTIVE COMMENTS IV-169

Marisa Gardner, Health and Environment Chairmán of the Mobile Community Organization IV-169
Myrt Jones, President, Mobile Bay Audubon Society IV-169
Gregory Spies, Northern Gulfcoast Archaeological Research Consortium IV-172

CHAPTER V--OTHER WRITTEN COMMENTS SUBMITTED AND RESPONSES TO THE SUBSTANTIVE COMMENTS V-1

C-1. Sidney R. Galler, U.S. Department of Commerce V-2
C-1. William H. Stevenson, Regional Director, National Marine Fisheries Service V-3

TABLE OF CONTENTS (Continued)

Page

C-1. Gordon Lill, Deputy Director, National Ocean Survey V-5
Response to C-1 V-6
C-2. John E. Wilson, Department of Housing and Urban Development V-8
C-3. James S. Stokes, IV, Alston, Miller, & Gaines V-9
Response to C-3 V-12
C-4. James R. Hyland, Alabama Forestry Commission V-13
C-5. James W. Cooper, Alabama Air Pollution Control Commission V-14
Response to C-5 V-27
C-6. James H. Lee, U.S. Department of the Interior V-28
Response to C-6 V-30
C-7. Roy F. Pettit, Department of Energy, Region IV V-32
Response to C-7 V-33
C-8. W.T. Willis, Alabama Department of Public Health V-34
C-9. O.H. Delchamps, Jr., Chairman of the Board, Delchamps V-35
C-10. Mrs. L.W. Atchison, Mobile, Alabama V-36
C-11. Albert Langley, Mobile, Alabama V-37
C-12. Kathryn Manders, Mobile, Alabama V-38
C-13. J.M. Doster, Mobile, Alabama V-39
C-14. Edward R. Zewen, Jr., Secretary, Bayou La Batre Chamber of Commerce V-40
C-15. Bill Roberts, Alabama State Senator, 35th District V-41
C-16. Mike Perloff, Alabama State Senator, 33rd District V-42
C-17. James B. Hildreth, U.S. Army Corps of Engineers, Mobile District V-43
Response to C-17 V-44
C-18. Glover Wilkins, Tennessee-Tombigbee Waterway Development Authority V-45
C-19. M.W. Gaillard, Mobile, Alabama V-46
C-20. James E. Yarbrough, Department of Health, Education, and Welfare, Region IV V-48
C-21. Harry N. Cook, National Waterways Conference V-49
C-22. Valeria Pinson and Frances P. Fisher, Executive Women International, Mobile Chapter V-51
C-23. C. LeNoir Thompson, Baldwin County Wildlife and Conservation Association V-52
C-24. C.A. Dunning and Bruce H. Hood, The Industrial Development Board of the City of Monroeville, Alabama V-53
C-25. Hugh A. Swingle, Marine Resource Division, Alabama Department of Conservation and Natural Resources V-54
C-26. James J. Britton, Alabama Chamber of Commerce V-55

TABLE OF CONTENTS (Continued)

Page

C-27. William J. Gehlen, First National Bank, Mobile Alabama V-56
C-28. J.H. Dint, Acting for W.B. Lingle, U.S. Department of Agriculture, Soil Conservation Service V-57
C-29. Charles N. Straub, Department of Housing and Urban Development V-58
C-30. Maryon Allen, U.S. Senator and John Sparkman, U.S. Senator V-59

CHAPTER VI--PROJECT MODIFICATIONS AND ADDITIONAL INFORMATION VI-1

CREATION OF WETLAND AREA VI-1
DISPOSAL OF SOILS REMOVED FROM DOCKING AREA VI-3

Reasons for Project Modification VI-3
Nature of the Project Modification and Related Activities VI-3
Proposed Project Alternatives VI-6
General Evaluation of Alternatives VI-10
Baseline Conditions at Potential Upland Disposal Sites VI-13
Environmental Evaluation of Upland Disposal Sites VI-20
Environmental Evaluation of Submerged Disposal Sites VI-23

APPENDICES

APPENDIX A A-1

CORPS OF ENGINEERS PUBLIC NOTICE ON THE PROPOSED TRESTLE AND ROADWAY BRIDGE

APPENDIX B B-1

FINAL DRAFT NPDES PERMITS (PLANT AND QUARRY SITES)

APPENDIX C C-1

IDEAL BASIC INDUSTRIES ENVIRONMENTAL PROTECTION PLAN DURING CONSTRUCTION

APPENDIX D D-1

LETTER FROM IDEAL BASIC INDUSTRIES CONCERNING CREATION OF A WETLAND AREA

TABLE OF CONTENTS (Continued)

Page

APPENDIX E E-1

ALABAMA AIR POLLUTION CONTROL COMMISSION PERMIT TO CONSTRUCT (QUARRY SITE)

APPENDIX F F-1

LETTERS FROM STATE HISTORICAL PRESERVATION OFFICER

LIST OF TABLES

Table		Page
III-1	Summary of Significant Adverse Environmental Impacts, Proposed Mitigating Measures, and Practical Alternatives: Plant Site	III-14
III-2	Summary of Significant Adverse Environmental Impacts, Proposed Mitigating Measures, and Practical Alternatives: Quarry Site	III-39
III-3	Streams Crossing the Quarry Site	III-43
VI-1	Characteristics of Soil Materials Requiring Disposal	VI-5
VI-2	Summary of Soil Disposal Alternatives	VI-7
VI-3	Probable Significance of Impacts Produced by Disposal of Soil at Potential Upland Sites	VI-21

LIST OF FIGURES

Figure		Page
III-1	Proposed Cement Plant and Quarry Sites	III-2
III-2	The Theodore Industrial Park Site	III-5
III-3	Present Land Use in the Vicinity of the Proposed Ideal Basic Industries Plant Site	III-6
III-4	Proposed Plant Plot Plan	III-8
III-5	Vegetation Map for the Proposed Plant Site	III-26
III-6	Present Land Use in the Vicinity of the Proposed Ideal Basic Industries Quarry Site	III-33
VI-1	Vegetation Map Showing Location of Projected Wetland Area	VI-2
VI-2	Possible Disposal Sites for Material Removed from Ideal's Waterfront Area	VI-8

SUMMARY SHEET FOR ENVIRONMENTAL IMPACT STATEMENT

CEMENT PLANT AND LIMESTONE QUARRY
IDEAL BASIC INDUSTRIES, INC.
THEODORE INDUSTRIAL PARK AND MONROE COUNTY, ALABAMA

( ) Draft
(X) Final

1. TYPE OF ACTION: Administrative (X) Legislative ( ).

2. DESCRIPTION OF ACTION:

The Environmental Impact Statement (EIS) was prepared by the Region IV office of the Environmental Protection Agency (EPA). EPA has prepared this document to fulfill the requirements of the National Environmental Policy Act of 1969 (NEPA) and the EPA January 11, 1977 regulations: Preparation of Environmental Impact Statements for New Source NPDES Permits (42 CFR 6.900). NEPA requires all Federal agencies to assess the impacts which would occur following a major Federal action which will result in a significant impact on the human environment.

Ideal Cement Company, a division of Ideal Basic Industries, Inc. (the applicant), has proposed to construct and operate a new 1.4 million metric ton (1.5 million ton) per year portland cement plant and supplemental limestone quarry. The cement plant will be located in the Theodore Industrial Park along the federally-authorized Theodore Ship Channel. The limestone quarry site will be located near Monroeville in Monroe County, Alabama, bordering the Alabama River.

The proposed plant site will involve the clearing of approximately 20 hectares (50 acres) of the 71-hectare (175-acre) tract owned by the applicant. When completed, the plant site will consist of a docking facility with loading and unloading equipment, grinding mills, kilns, storage and mixing silos, an aboveground fuel oil storage tank, underground diesel and gasoline tanks, and raw material storage piles.

The quarry site consists of 1,633 hectares (4,035 acres) of modified timberland which is currently being converted to pastureland. Approximately 40 hectares (100 acres) will be cleared and graded for the access road, main building, and stockpile area. An estimated 14 hectares (35 acres) of the quarry property will be impacted during each year of operation. As the quarrying progresses, the overburden removed will be used for reclamation of the quarried areas no longer in production. Over the projected 50-year life of the quarry, approximately 80 percent of the area will be impacted by quarrying. Facilities to be constructed at the quarry site will be the barge docking and loading facility, clarification basins, limestone storage piles, an office and maintenance shop, a well and pump house for potable water, a septic tank and drainfield, and underground diesel fuel and gasoline tanks.

No construction has commenced, pending issuance of the EPA's NPDES Permit, EPA's Authority to Construct (EPA Regulations for the Prevention of Significant Deterioration of Air Quality, 40 CFR 52.21), the Corps of Engineers' Section 10 and Section 404 Construction Permit, and the necessary state approval certificates and permits.

3. MAJOR ENVIRONMENTAL IMPACTS

(A) CONSTRUCTION

Plant

The plant site is undeveloped land within the Theodore Industrial Park. Site construction will employ an average of 360 workers, with a peak of 700 workers. A short-term increase in air pollution, especially fugitive dust, is expected on and near the plant site. Pollutants in the form of suspended solids from site preparation runoff and construction of the access road and railroad corridor on the property will drain to the barge canal and the North Fork Deer River. Some regrowth vegetation following recent timber harvest will be removed, which will alter existing wildlife habitat. Increased noise in the vicinity of the proposed plant site will result from site construction and increased vehicular use of roadways.

Quarry

Construction of the quarry site will commit an estimated 80 percent of the 1,633 hectares (4,035 acres) of company-owned and leased property to limestone production. Construction will employ an average of 133 workers for 18 months, with a peak labor force of 250 workers. Fugitive dust is expected on and near the quarry site during construction. Noise generated by earthmoving equipment and construction of the docking facility will have minimal impacts. Impacts from removal of vegetation and alteration of wildlife habitat will be of low magnitude since much of the timber has been harvested for conversion of the area to pastureland. Stormwater runoff may increase suspended solids levels in some on-site creeks and the Alabama River.

Construction of the cement plant and limestone quarry will have positive impacts on the economy in the Mobile area and in Monroe County. These impacts will be of moderate significance. All adverse impacts resulting from construction of the cement plant and quarry will be of moderate to low magnitude and significance.

(B) OPERATION

Plant

Operation impacts will be long-term, i.e., occurring throughout the life of the proposed cement plant (about 50 years). Impacts to air quality will be increased levels of sulfur dioxide, nitrogen oxides, and particulate matter. EPA has determined that the operation of the cement plant will not cause a violation of the applicable air quality standards. However, the available deterioration increments will be reduced for other new source industries which will build in certain limited areas of Theodore Industrial Park. Wastewater discharges to the Theodore Ship Channel will be limited to overflow from a settling basin collecting limestone and clay storage pile runoff, cooling tower blowdown, truck and process area wash water, and oil tank stormwater runoff. Rainfall runoff from the remainder of the plant site will be directed to a catchment area which will discharge into the freshwater wetlands north of the plant site. These discharges are considered of low magnitude and significance. EPA's preliminary determination is that the discharges will comply with applicable water quality standards. Solid wastes will be disposed in state-permitted sanitary landfills. Noise impacts from plant operation will be of moderate magnitude and low significance to the surrounding area.

Quarry

The major impact from operation of the limestone quarry will be the constant change in topographic features over the projected 50-year life of the quarry. Approximately 14 hectares (35 acres) will be quarried and a comparable area reclaimed each year. Reclamation of the limestone quarry will replace the overburden in a manner which will provide for drainage and permit reseeding to grass and return to pastureland. Clarification basins designed to collect runoff from the quarry operation will discharge water to the Alabama River and the creeks on the quarry property. EPA's preliminary determination is that these discharges will comply with applicable water quality standards and will be of low significance. Fugitive dust will be generated from quarry operations but will be controlled by watering and will normally be confined within the limits of the active quarry area. Noise from the quarry operation will not adversely impact residences. Transport of the limestone will increase barge traffic on the Alabama River.

Adverse impacts from operation of the cement plant and limestone quarry will be of low to moderate magnitude with low significance. Beneficial impacts to the economy in the Mobile area and in Monroe County, including supporting services, will result from operation of the cement plant and limestone quarry. These impacts will be of moderate to high magnitude and of moderate significance.

4. ALTERNATIVES TO THE PROPOSED ACTION

(A) PLANT

Twenty-seven alternative plant sites were considered for locating the cement plant. The selected site is in an industrial park designated by the State of Alabama and Mobile County to be used for industrial development.

The alternatives for the manufacture of cement are the wet process and the dry process. The dry process was selected mainly due to lower energy requirements and possibly lower maintenance costs. Alternative raw materials considered for the calcium supply were dolomite from the proposed Gaillard quarry site and several other sources, aragonite from the Bahamas, and oyster shells from the Gulf Coast area. Oil and natural gas were considered as alternative fuels to operate the plant.

Alternatives considered for solid waste disposal were use of county-maintained sanitary landfills and on-site burial.

Alternative air pollution abatement devices considered for control of particulate emissions were baghouses, electrostatic precipitators, scrubbers, and multicyclones. Water sprays and enclosing/venting to a baghouse were the alternatives considered for fugitive dust control.

Alternative treatment and discharge of process-related wastewaters and stormwater runoff from the plant were considered. The alternatives were to direct wastewater discharges to the wetlands north of the plant, to direct these discharges to the proposed ship channel, or to use the proposed wastewater pipeline to Mobile Bay. Alternatives considered for the general stormwater runoff were to discharge to the wetlands, to the proposed ship channel, or partially to both the wetlands and the ship channel. Alternative access corridors considered were from the north across the North Fork Deer River through the wetlands, and bridging the entire wetland area, and from Dauphin Island Parkway on the east.

(B) QUARRY

Alternative air pollution abatement devices considered for control of particulate emissions were water sprays and enclosures with baghouses. Solid waste alternatives considered were burning, chipping, on-site landfilling, and use of Monroe County Landfill.

Alternatives for controlling wastewater discharges considered were clarification basins, vegetative buffers, and quarry pit storage. Alternatives for reclamation of quarry lands were pastureland, timberland, and industrial development.

5. AGENCIES AND INDIVIDUALS WHO COMMENTED ON THE DEIS

FEDERAL AGENCIES

Department of Housing and Urban Development
Department of Energy
Corps of Engineers
Department of Commerce
    National Oceanic and Atmospheric Administration
        National Marine Fisheries Service
        National Ocean Survey
Department of Health, Education, and Welfare
Department of Interior
    Fish and Wildlife Service

MEMBERS OF CONGRESS

Honorable John J. Sparkman, United States Senate
Honorable Maryon Allen, United States Senate
Honorable Jack Edwards, United States House of Representatives

STATE AGENCIES

Alabama Air Pollution Control Commission
Alabama Department of Conservation and Natural Resources
Alabama Forestry Commission
Alabama Water Improvement Commission
Alabama State Docks Department
Alabama State Highway Department
Alabama Department of Public Health

STATE OFFICIALS

Honorable George Wallace, Governor of Alabama
Mike Perloff, Alabama State Senator
L.W. Noonan, Alabama State Senator
Bill Roberts, Alabama State Senator
John McMillan, Alabama State Representative
H.L. Callahan, Alabama State Representative
Bob Glass, Alabama State Representative
Joe McCorquodale, Speaker, Alabama House of Representatives
James Warren, Alabama State Representative

LOCAL AGENCIES

Mobile County Commission
South Alabama Regional Planning Commission
Mayor's Office, City of Mobile
City Council, City of Bayou La Batre
Monroe County Commission

INTERESTED GROUPS

Merchants National Bank of Mobile
Alabama Power Company
National Waterways Conference, Inc.
Tennessee-Tombigbee Waterway Development Authority
Bayou La Batre Area Chamber of Commerce
Warrior-Tombigbee Development Association
Mid-Gulf Business Roundtable
Mobile Traffic and Transportation Club
Propeller Club of the United States, Mobile Chapter
Industrial Development Board, City of Mobile
Underwood Builders Supply Company
Baldwin County Wildlife and Conservation Association
Alabama Coastal Area Board
Tillman's Corner Chamber of Commerce
Southern Industries Corporation

INTERESTED GROUPS
(Continued)

Coosa-Alabama River Improvement Association
Pope & Quint Co.
First National Bank of Mobile
Mobile Area Chamber of Commerce
Associated Industries of Alabama
Smith Kelly Supply Co.
Mobile Bay Audubon Society
Mobile County Wildlife and Conservation Association
Mobile Bar Pilots Association
American National Bank and Trust Company of Mobile
First National Bank of Mobile
Alabama Chamber of Commerce
Industrial Development Board of the City of Monroeville
Executive Women International, Mobile Chapter
Alston, Miller, and Gaines
Monroeville Area Chamber of Commerce
Monroe County Conservation Club
Hollingers Island Patrol (Community Association)
Home Builders Association of Mobile
Louisville and Nashville Railroad Company
J.S. Walton and Company
Northern Gulfcoast Archaeological Research Consortium

INTERESTED INDIVIDUALS

Mrs. L.W. Atchison
Mr. Albert Langley
Ms. Kathryn Manders
Mr. J.M. Doster
Dr. M. Wilson Gaillard, Sr.
Mrs. Marisa Gardner
Mrs. Myrt Jones
Mr. Gregory Spies

INTERESTED INDIVIDUALS
(Continued)

Ms. Fran Bryan
Mr. Horace B. Lamar
Mr. William H. Holland
Ms. Debra Howard
Ms. Jean D. King
Mr. O.H. Delchamps, Jr.
Mr. Albert J. Meacham
Mr. R.B. Williams
Dr. S.S. Gaillard
Mrs. Fanney R. Gaillard
Mr. Agee Braoghton
Mr. Sam Nichols
Mr. Tom Perkins
Mr. Andrew J. Moore
Mr. Mazell Bryant
Mr. John Nichols

6. This FEIS was made available to the Office of Federal Activities (OFA) and the public in September 1978.

CHAPTER I. INTRODUCTION

FEDERAL ACTIONS

Ideal Cement Company, a division of Ideal Basic Industries, Incorporated, of Denver, Colorado, plans to construct and operate a cement manufacturing facility near Mobile, Alabama, and a limestone quarry near Monroeville, Alabama. The cement plant will use limestone from the quarry as its principal raw material. The plant and quarry water discharges will be subject to the National Pollutant Discharge Elimination System (NPDES) new source effluent limitations and permit requirements. As a prerequisite to granting the required new source NPDES permits, the U.S. Environmental Protection Agency (EPA) has been required by the National Environmental Policy Act (NEPA) of 1969 to evaluate all potential environmental impacts of the proposed project.

This Final Environmental Impact Statement (FEIS) summarizes the project and its expected effects on the natural and social environment. Pursuant to regulations implementing the National Environmental Policy Act of 1969, this FEIS was prepared by utilizing a third party consultant approval procedure. Under this procedure, the applicant, Ideal Basic Industries, Incorporated, nominated Environmental Science and Engineering, Incorporated (ESE) as the contractor. An objectivity and qualification statement was submitted to EPA and circulated by EPA to interested parties for comment. After the comments were reviewed, final approval of ESE was made by EPA, Region IV. All work completed by ESE was reviewed, approved, and modified where appropriate by EPA before final publication.

The other pending major federal action is the issuance of Section 10 and Section 404 permits for dredging, construction of the docking facilities and discharge structure at the plant site on the proposed Theodore Ship Channel and at the Monroe County quarry site on the Alabama River, and for construction of the access corridor across the wetlands at the plant site. The U.S. Army Corps of Engineers administers this regulatory program and must determine whether issuance of the permits is in the public interest. The Corps of Engineers has circulated Draft Public Notices on their Section 10 and Section 404 permits. The Corps participated in the EIS process by supplying EPA with preparation comments prior to issuance of the DEIS and FEIS.

FORMAT AND CONTENTS

This FEIS is divided into six chapters. Chapter I is an introduction; Chapter II is a Statement of Findings, which presents the Agency's decisions on the issuance of a NPDES new source permit and the rationale for each area of concern. Chapter III is a brief summary of the DEIS. Although it is designed to give an overview of the EIS process elements, the DEIS must be consulted for more detailed coverage. Chapter IV contains the official public hearing transcript, written comments submitted at the public hearing, and responses to substantive hearing comments. Chapter V includes the written comments received during the comment period and responses to substantive comments. Chapter VI discusses additional information requested by other agencies and modifications of the proposed project by Ideal Basic Industries which were not addressed in the DEIS. The appendices, which supplement the appendices to the DEIS, include the amendment to Corps of Engineers Draft Public Notice for the Section 10 and Section 404 permits at the plant site, the EPA final draft NPDES permits, the Ideal Basic Industries proposed Environmental Protection Plan During Construction, the Alabama Air Pollution Control Commission permit to construct at the quarry site, and letters from the State Historic Preservation Officer regarding the eligibility of any of the sites for the National Register of Historic Places.

A 30-day comment period is initiated upon the concurrent receipt of this document by the EPA Office of Federal Activities and the availability of the document to the public. No federal actions (issuance of permits) can take place during this period so that comments from other agencies and from the public concerning these pending actions can be reviewed.

CHAPTER II. STATEMENT OF FINDINGS

AGENCY DECISION

Based on the comprehensive review of this project in compliance with the National Environmental Policy Act of 1969, EPA Region IV intends to issue the water discharge permits for Ideal Basic Industries cement plant and limestone quarry. These NPDES permits can be issued on the expiration of the 30-day administrative waiting period which begins upon the concurrent receipt of this document by the EPA Office of Federal Activities and the availability of the document to the public.

NEED FOR THE PROJECT

Demand for new cement manufacturing capacity to serve the Gulf Coast market was identified by Ideal Basic Industries as early as 1972. Subsequent company studies established that the most efficient means of meeting this demand would involve a single large plant [capacity 1.4 million metric tons (1.5 million tons)] at Theodore and a limestone quarry in Monroe County, Alabama, to supply the principal raw material. Recent economic trends in the Gulf Coast area have confirmed the need for this facility.

AIR QUALITY

Air quality in the vicinity of the Theodore plant site will be affected by fugitive dust emissions and the burning of vegetative material during the construction phase of the project, and by process emissions during the operation phase. The construction impacts will be low in magnitude and significance due to the use of chipping and an air-blower type pit burner to dispose of vegetative wastes, and the watering of construction areas to suppress fugitive dust. The major process emissions will be particulate matter and sulfur dioxide. The use of baghouses on all process exhausts and the burning of 1.5 percent sulfur coal will allow compliance with all Prevention of Significant Deterioration (PSD) requirements. The effects of plant operation on ambient air quality and the utilization of PSD increments are rated low in significance as environmental impacts.

The only appreciable influences on air quality at the quarry site will be the burning of vegetative waste during construction and the emission of fugitive dust throughout the project. Mulching of some vegetative wastes and use of efficient burning techniques, as well as the inherent moisture content of the limestone (22 percent), the use of water sprays, and effective methods of land reclamation, will limit the importance of these effects.

NOISE

The Ideal Basic Industries project at Theodore will elevate noise levels in nearby areas during both the construction and operation phases. The noise effects during construction may overlap with the noise influence of the Theodore Ship Channel dredging by the Corps of Engineers. There are relatively few noise-sensitive land uses near the plant site at present, and the number is expected to diminish due to future land use conversions. Consequently, the noise impacts of the project at Theodore are attributed low significance. Noise generation at the quarry site is considered to be of low significance because of the isolation of the site.

SOLID WASTE

Construction debris and possibly some vegetative waste at the Theodore plant site will be disposed at the Irvington Landfill. This facility likewise will be utilized for all wastes generated during permanent operations, with the exception of recyclable materials. The burning of vegetative waste during construction will have a small effect on air quality. At the quarry site, Ideal Basic Industries will dispose of construction debris and operation wastes at the Monroe County Landfill. The only impact at either site will be the utilization of some portion of existing landfill capacity.

WATER RESOURCES

Soil erosion and sediment transport to surface waters can be expected at the plant site during construction, but will be mitigated by erosion controls and the construction of stormwater catchment areas (see the Ideal Environmental Protection Plan During Construction, Appendix C). The catchment areas will drain into the freshwater marsh bordering North Fork Deer River and will be retained to treat general stormwater runoff from the developed plant site. The impacts of stormwater runoff during both construction and operation will be of low significance. The only process wastewaters at the plant will consist of cooling system blowdown, various area washdown discharges, and stormwater runoff from material storage piles and the bermed area around the oil storage tanks. These flows will be treated in a settling basin facility and discharged to the ship channel. The discharge will meet Alabama Fish and Wildlife Standards and will constitute an environmental impact of low magnitude and significance. A discussion of the impacts and of the alternatives for the disposal of dredged material associated with the docking facility is presented in Chapter VI, Project Modifications and Additional Information.

Erosion and sedimentation at the quarry site will occur as a result of construction, quarrying, material stockpiling, and land reclamation activities. The principal environmental safeguard will be the construction of clarification basins to serve all of the land areas affected by the project. Settleability studies indicate that the basin discharge will meet Alabama Water Improvement Commission's requirements. The water resource impacts of land disturbance will also be limited by revegetation, mulching, terracing, ditching, and observance of setbacks from major streams. The quarry project will produce permanent changes in surface drainage patterns and will affect groundwater flows on a localized, temporary basis. The limestone quarry reclamation plan will limit these effects and the overall change in landforms to low significance as environmental impacts.

ARCHAEOLOGY

No sites of archaeological-historical interest will be affected by either construction or operation of the proposed cement plant. At the quarry site, the archaeological-historical survey revealed one site that will be disturbed by quarrying. However, test excavations did not reveal significant archaeological evidence to mandate further investigation.

ECOLOGY

The two major vegetative communities found at the Ideal Basic Industries plant site are the modified longleaf pine forest occupying the upland areas, and the freshwater and brackish marshes bordering the North Fork Deer River. The loss of pine forest and associated wildlife habitat due to construction of the plant are attributed low significance because of the modified nature of the forest (as a result of recent timber harvesting) and because of the abundance of similar habitat in the region. The project will involve no loss of brackish marsh and will affect the freshwater marsh only at the crossing of the access corridor. Ideal Basic Industries has agreed to create an additional 0.6 hectare (1.5 acres) of wetland area to mitigate the loss of the 0.2 hectare (0.5 acre) of freshwater marsh for the roadway crossing. Therefore, the impact of the project on wetlands will be low in significance. Aquatic ecosystems will potentially be influenced by erosion/sedimentation, dredging, stormwater discharge, and wastewater discharge, but these effects will be minor because of the mitigative measures employed.

The quarry site contains five vegetational communities: improved pasture and cropland, remnant forest, floodplain, pine-oak forest, and hardwood bottomland. The site provides favorable habitat for a substantial variety of plant and animal species including several special-status species. However, all of the habitats represented are abundant in the surrounding area. An important factor is that the site is currently being cleared by a local rancher; the land condition encountered by the quarrying operation will consist of improved pasture in most cases. The losses of vegetation and habitat resulting from the Ideal project will be minimized by this factor and by the provisions of the quarry site reclamation plan, so that these impacts will have low magnitude and significance. The present land clearance activity and increased agricultural use of the property are affecting aquatic ecosystems in the tributary streams that cross the site. The erosion/sedimentation effects of the quarry project will extend these conditions but will not require any further ecological adjustments.

SOCIOECONOMICS

The Ideal Basic Industries project will create substantial economic benefits for both the Mobile County and Monroe County communities. These benefits will involve construction employment, permanent employment, purchases of supplies and services, and various multiplier effects. The project at Theodore will have minor negative influences on traffic and the value of land for residential use, which will be offset by future highway improvements and land conversions. Neither the cement plant nor the quarry project will create stresses involving community facilities, housing, or social conditions.

CHAPTER III. SUMMARY OF THE DEIS

INTRODUCTION

This section presents a summary of the DEIS as published on May 19, 1978. Modifications to the project description and additional information requested during the review process are discussed in Chapter VI.

PROJECT HISTORY AND SITE SELECTION

The Ideal Basic Industries project will involve a capital expenditure of over $200 million (in 1977 dollars), including more than $20 million for air and water pollution abatement. Planning for the project began in 1972 with studies by Ideal that identified a need for substantial new cement manufacturing capacity in the central Gulf Coast area. The magnitude of demand was placed at 1.4 million metric tons (1.5 million tons) per year.

The options identified by Ideal Basic Industries were to upgrade existing corporate facilities, to construct two new plants of moderate capacity [700,000 metric tons (750,000 tons)], or to construct a single large facility. Upgrading of existing plants was judged infeasible because of locational and site constraints, whereas the multiple-plant option was found unfavorable from a cost standpoint. Studies were therefore undertaken to select a site for a single new manufacturing plant. A total of 27 potential plant sites in 5 states were evaluated in terms of 11 major site selection criteria. The proposed property in Theodore Industrial Park emerged as the most favorable plant location due to its deep-water access, environmental compatibility, general suitability for development, and proximity to markets and production inputs.

Alternative sources of calcium carbonate supply for the plant were also evaluated. These included the use of oyster shells and calcareous

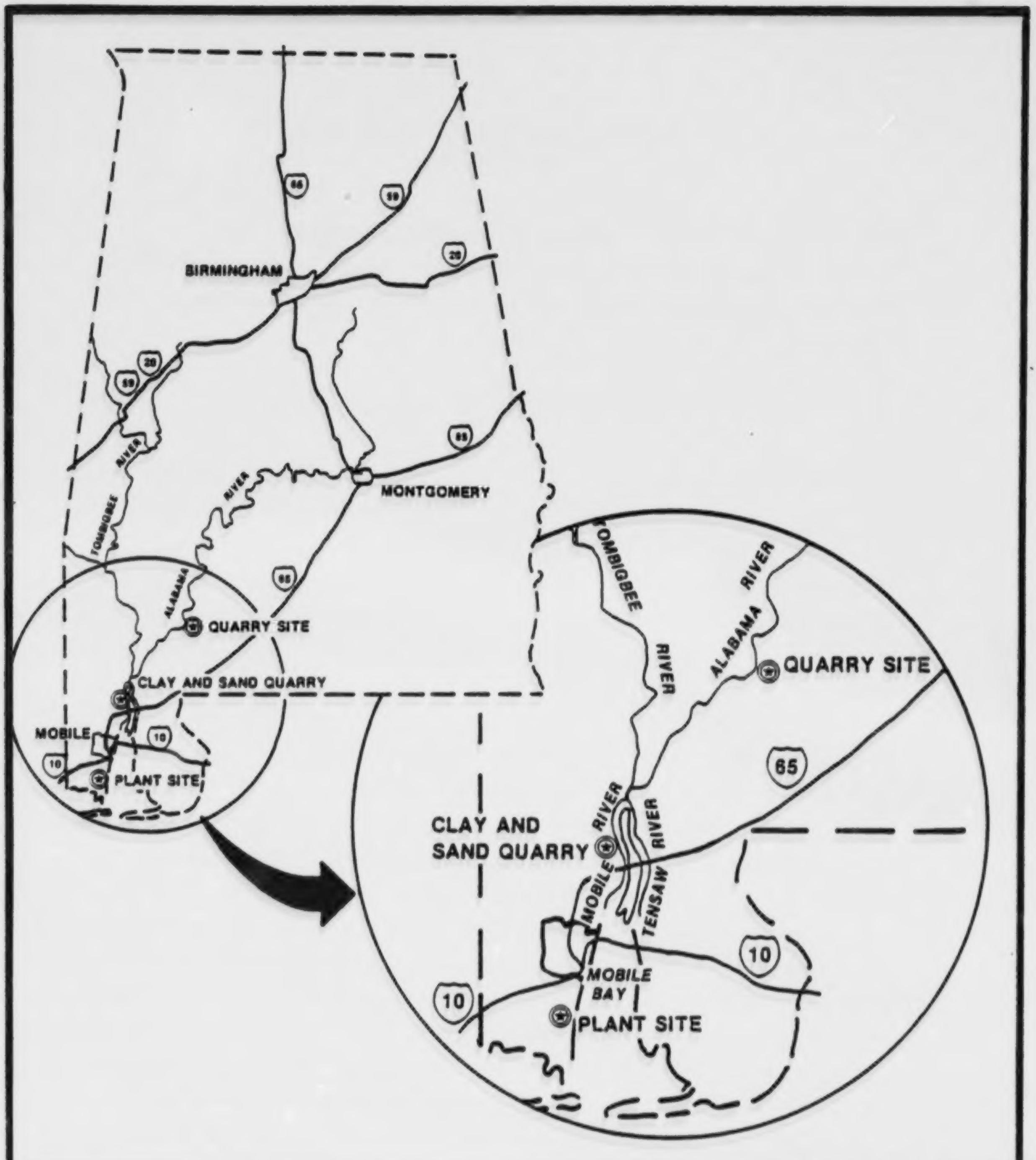

65
59
20
BIRMINGHAM
20
59
RIVER
TOMBIGBEE
RIVER
ALABAMA
85
MONTGOMERY
65
QUARRY SITE
CLAY AND SAND QUARRY
MOBILE
10
10
PLANT SITE
TOMBIGBEE
RIVER
ALABAMA
RIVER
QUARRY SITE
65
CLAY AND
SAND QUARRY
MOBILE
RIVER
TENSAW
RIVER
10
MOBILE
BAY
10
PLANT SITE

Figure III-1
PROPOSED CEMENT PLANT AND QUARRY SITES
(EXISTING CLAY AND SAND QUARRY ALSO SHOWN)

0 40 80
SCALE IN KILOMETERS

N

SOURCE: Environmental Science and Engineering, Inc., 1977.

REGION IV
U.S. ENVIRONMENTAL PROTECTION
AGENCY ENVIRONMENTAL IMPACT
STATEMENT FOR IDEAL BASIC INDUSTRIES

PROPOSED CEMENT MANUFACTURING
PLANT THEODORE INDUSTRIAL PARK
AND PROPOSED GAILLARD QUARRY

marine deposits (aragonite), as well as the quarrying of limestone at various locations. The opening of a limestone quarry in Monroe County, Alabama, was the chosen alternative largely because of economic considerations. The general locations of the quarry and plant sites are depicted in Figure III-1. Limestone from the quarry will be barged 180 kilometers (110 river miles) down the Alabama and Mobile rivers to the plant site at Theodore.

Further discussion of the Ideal Basic Industries project in this document will deal first with the construction and operation of the plant at Theodore, and subsequently with the limestone quarry.

PLANT SITE

SITE CHARACTERISTICS

The Ideal Basic Industries cement plant site is located in Mobile County just south of the city limits of Mobile, Alabama. The 70.8-hectare (175-acre) site is within the Theodore Industrial Park, a 1,800-hectare (4,400-acre) area in which more than one-half billion dollars has already been invested by manufacturing firms. Completion of the federally-authorized Theodore Ship Channel will provide deep water access to the park.

The Ideal Basic Industries plant site borders on the Theodore Barge Canal (to be replaced by the Theodore Ship Channel) and the Dauphin Island Parkway (see Figure III-2). Most nearby land to the west and southwest of the site either is developed for industrial use or is held by manufacturing firms. As shown by Figure III-3, vacant land and residential land are predominant to the south, east, and northeast of the plant site. The overall density of settlement is low. The residential properties closest to the Ideal Basic Industries site are located on Deer River Road, the Dauphin Island Parkway, and the south bank of the barge canal. A number of these properties will be taken for the Theodore Ship Channel project, and much of the remaining residential land near the ship channel is expected to convert to industrial use in the near future.

The Ideal Basic Industries property is uninhabited and is covered primarily by remnant pine and scrub vegetation that has been affected by previous lumbering activity. The North Fork Deer River, which crosses the central portion of the site, is a minor stream in terms of flow and average width, and is bordered by freshwater and saltwater marshes.

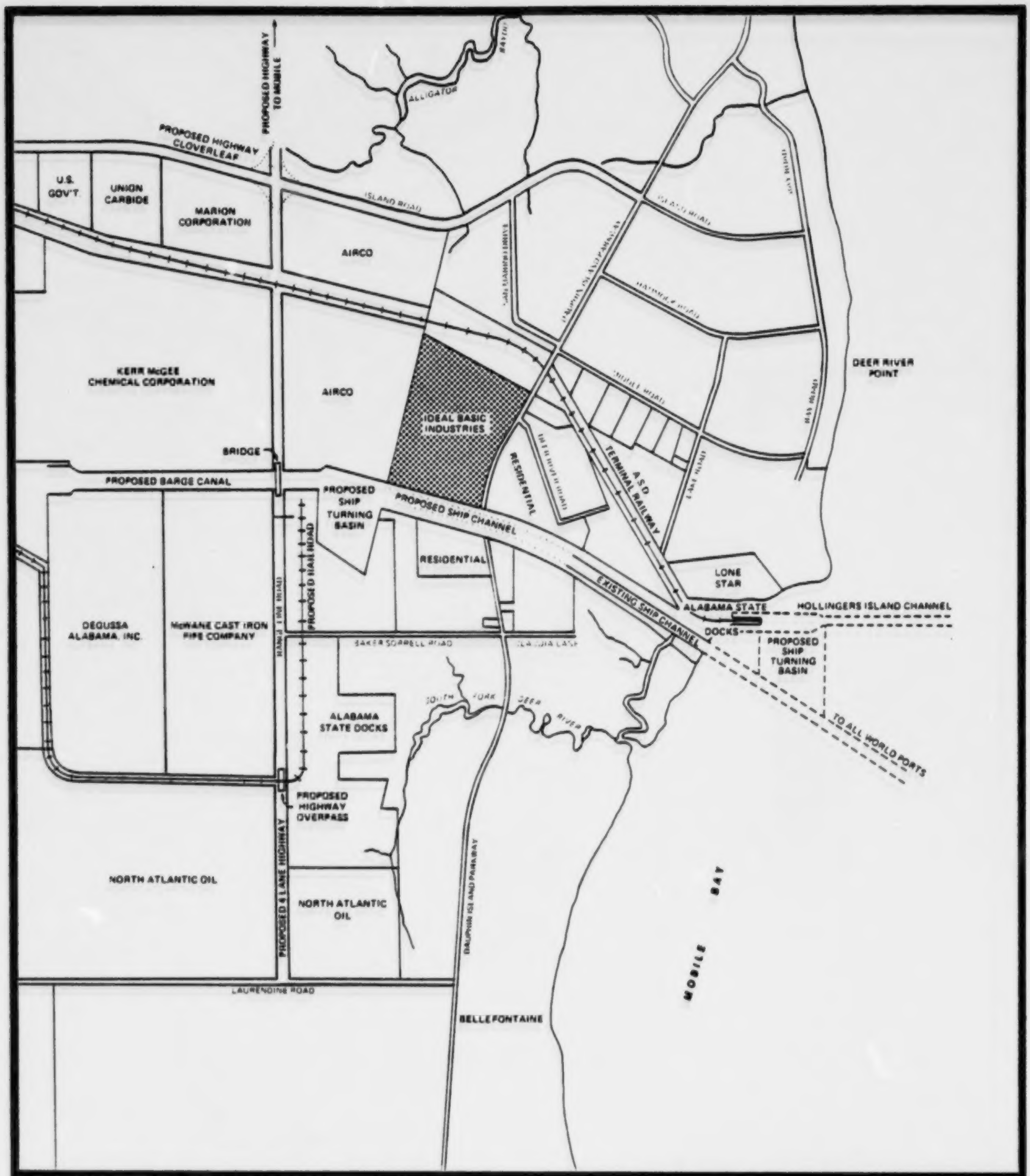

ALLIGATOR
BAYOU
PROPOSED HIGHWAY TO MOBILE
PROPOSED HIGHWAY CLOVERLEAF
ISLAND ROAD
U.S. GOV'T.
UNION CARBIDE
MARION CORPORATION
AIRCO
KERR McGEE CHEMICAL CORPORATION
AIRCO
IDEAL BASIC INDUSTRIES
RESIDENTIAL
A S D TERMINAL RAILWAY
DEER RIVER POINT
BRIDGE
PROPOSED BARGE CANAL
PROPOSED SHIP TURNING BASIN
PROPOSED SHIP CHANNEL
RESIDENTIAL
LONE STAR
EXISTING SHIP CHANNEL
ALABAMA STATE DOCKS
HOLLINGERS ISLAND CHANNEL
PROPOSED SHIP TURNING BASIN
TO ALL WORLD PORTS
PROPOSED RAILROAD
DEGUSSA ALABAMA, INC.
McWANE CAST IRON PIPE COMPANY
BAKER SORRELL ROAD
SOUTH FORK DEER RIVER
ALABAMA STATE DOCKS
PROPOSED HIGHWAY OVERPASS
PROPOSED 4 LANE HIGHWAY
NORTH ATLANTIC OIL
NORTH ATLANTIC OIL
DAUPHIN ISLAND PARKWAY
MOBILE BAY
LAURENDINE ROAD
BELLEFONTAINE

Figure III-2
THE THEODORE INDUSTRIAL PARK SITE
(Adapted from Mobile Area Chamber of Commerce, 1976)

0 1000
SCALE IN METERS

N

SOURCE: Environmental Science and Engineering, Inc., 1978.

REGION IV
U.S. ENVIRONMENTAL PROTECTION AGENCY ENVIRONMENTAL IMPACT STATEMENT FOR IDEAL BASIC INDUSTRIES

PROPOSED CEMENT MANUFACTURING PLANT THEODORE INDUSTRIAL PARK MOBILE, ALABAMA

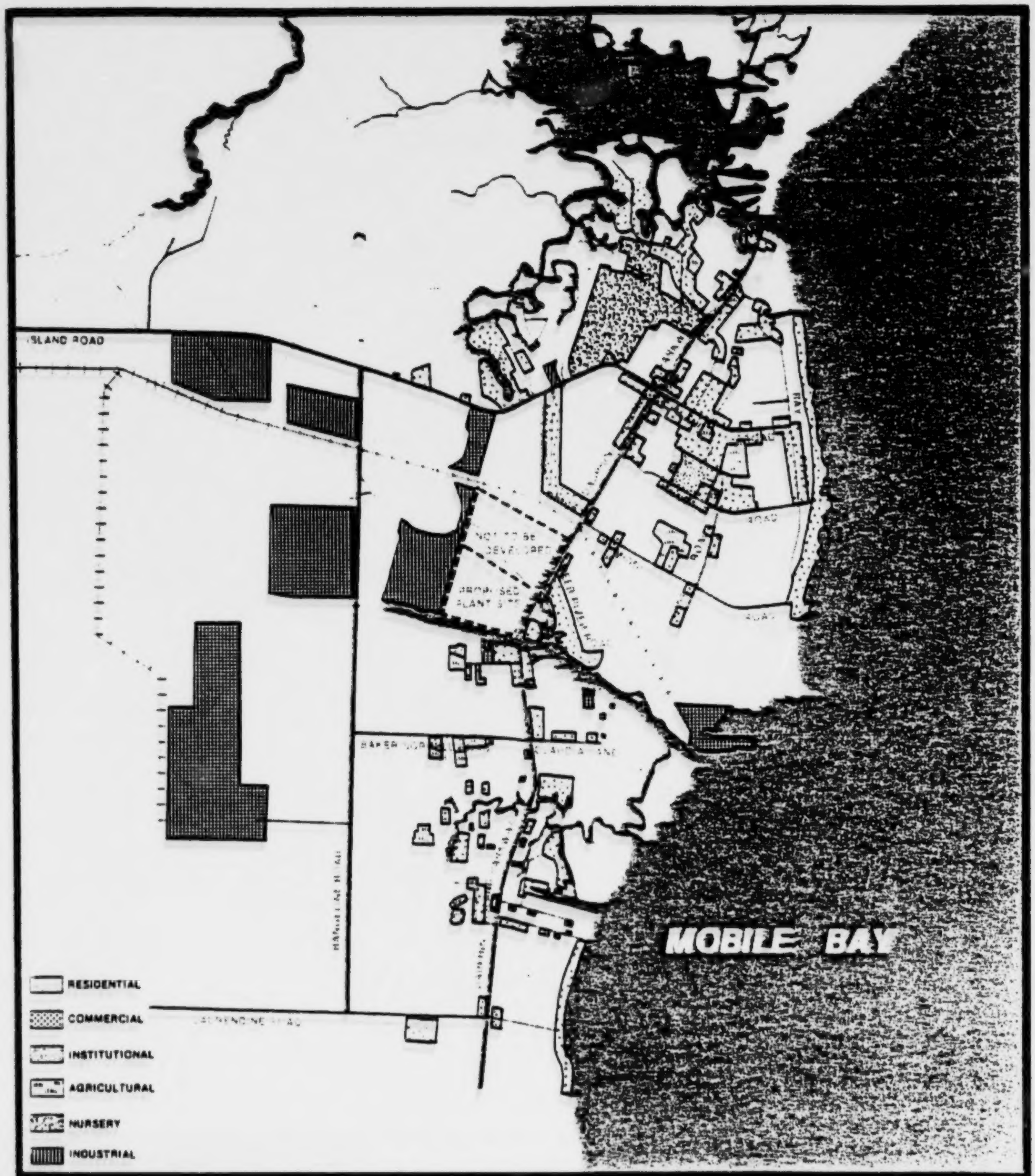

ISLAND ROAD
NOT TO BE DEVELOPED
PROPOSED PLANT SITE
ROAD
MOBILE BAY
RESIDENTIAL
COMMERCIAL
INSTITUTIONAL
AGRICULTURAL
NURSERY
INDUSTRIAL

Figure III-3
PRESENT LAND USE IN THE VICINITY OF THE PROPOSED IDEAL BASIC INDUSTRIES PLANT SITE

0 0.5 1
SCALE IN KILOMETERS

N

SOURCE. Environmental Science and Engineering, Inc., 1977.

REGION IV
U.S. ENVIRONMENTAL PROTECTION
AGENCY ENVIRONMENTAL IMPACT
STATEMENT FOR IDEAL BASIC INDUSTRIES

PROPOSED CEMENT MANUFACTURING
PLANT THEODORE INDUSTRIAL PARK
MOBILE, ALABAMA

PLANT LAYOUT AND CONSTRUCTION

The layout of the proposed cement manufacturing facility is depicted in Figure III-4. Only the southern portion of the Ideal Basic Industries property and an access corridor extending along the western edge of the property will be developed for production facilities. The wetland areas immediately associated with the North Fork Deer River will be undisturbed except for the crossing of the access corridor in the freshwater portion of the wetlands (see Chapter VI for further discussion of the wetlands area). Along the eastern property line bordering the Dauphin Island Parkway, a strip of wooded land about 90 meters (300 feet) in width will be left undeveloped as a buffer between the cement plant and the residential properties to the east.

The entire waterfront at the plant site [about 716 meters (2,350 feet)] will be developed as a dock area for loading, unloading, and holding of marine equipment. The process areas will be clustered in the central portion of the plant site. The tallest structures will be two 90-meter (300-foot) high stacks and two 76-meter (250-foot) high suspension preheaters. A railcar unloading and staging area will be located in the northern portion of the site. The railroad spur line and the paved access road will form a corridor about 47.2 meters (155 feet) from the western property line that will extend north to the State Docks Railroad. The access road will continue north and intersect Island Road (Hamilton Boulevard).

A large portion of the developed land area will be utilized for storage of raw materials. Storage capacity will be provided for 604,000 metric tons (665,000 tons) of limestone; 45,000 metric tons (50,000 tons) of coal; 27,000 metric tons (30,000 tons) of gypsum; and much smaller amounts of wet clay, dried clay, sand, and iron ore. More than 80 percent of the limestone will be placed in a dead storage pile 20 meters (65 feet) high. All material storage areas other than the limestone and wet clay piles will be under a roof as a means of minimizing water quality problems from stormwater runoff.

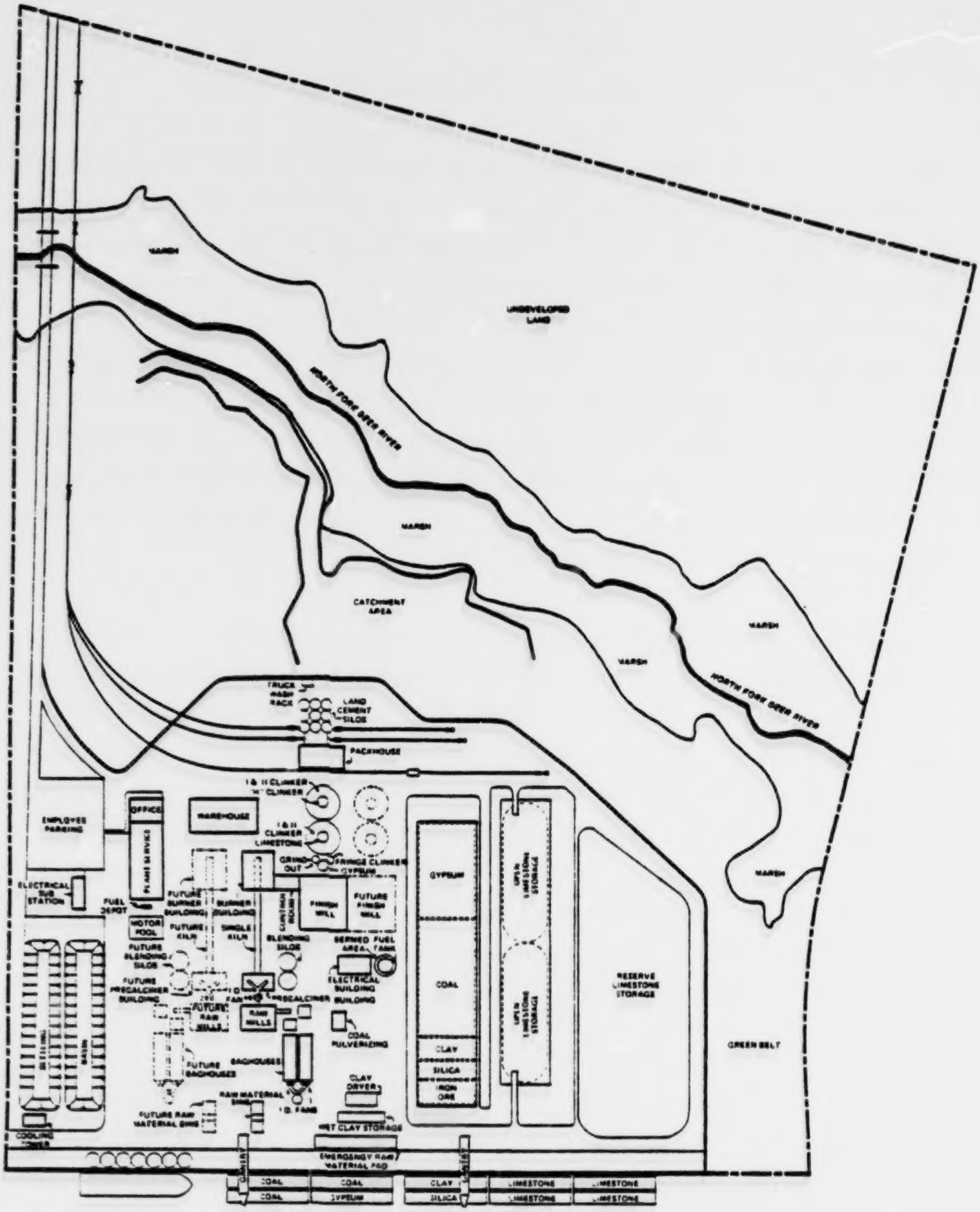

MARSH
UNDEVELOPED LAND
NORTH FORK DEER RIVER
MARSH
CATCHMENT AREA
MARSH
MARSH
NORTH FORK DEER RIVER
MARSH
TRUCK WASH RACK
LAND CEMENT SILOS
PACKHOUSE
I & II CLINKER
"I" CLINKER
I & II CLINKER
LIMESTONE
GRIND OUT
FRINGE CLINKER
GYPSUM
EMPLOYEE PARKING
OFFICE
PLANT SERVICES
WAREHOUSE
ELECTRICAL SUB STATION
FUEL DEPOT
MOTOR POOL
FUTURE BURNER BUILDING
BURNER BUILDING
FUTURE KILN
SINGLE KILN
FINISH MILL
FUTURE FINISH MILL
BLENDING SILOS
BERMED AREA
FUEL TANK
FUTURE BLENDING SILOS
FUTURE PRECALCINER BUILDING
I.D. FAN
PRECALCINER
ELECTRICAL BUILDING
BUILDING
FUTURE RAW MILLS
RAW MILLS
COAL PULVERIZING
FUTURE BAGHOUSES
BAGHOUSES
CLAY DRYER
RAW MATERIAL BINS
I.D. FANS
FUTURE RAW MATERIAL BINS
WET CLAY STORAGE
SETTLING
BASIN
COOLING TOWER
EMERGENCY RAW MATERIAL PAD
GYPSUM
COAL
CLAY
SILICA
IRON ORE
OPEN LIMESTONE STORAGE
OPEN LIMESTONE STORAGE
RESERVE LIMESTONE STORAGE
GREEN BELT
COAL
COAL
COAL
GYPSUM
CLAY
SILICA
LIMESTONE
LIMESTONE
LIMESTONE
LIMESTONE

Figure III-4
PROPOSED PLANT PLOT PLAN

0 100
SCALE IN METERS

N

SOURCE: Ideal Basic Industries, 1977.

REGION IV
U.S. ENVIRONMENTAL PROTECTION AGENCY ENVIRONMENTAL IMPACT STATEMENT FOR IDEAL BASIC INDUSTRIES

PROPOSED CEMENT MANUFACTURING PLANT THEODORE INDUSTRIAL PARK
MOBILE, ALABAMA

The plant site will contain two areas for treating rainfall runoff and other wastewaters. Stormwater runoff from the uncovered storage piles and the bermed area around the oil storage tank will be directed to a settling basin at the southwest corner of the site. This basin will also treat blowdown water from the plant cooling system and wastewater from the process wash areas. The effluent from this basin will be discharged to the ship channel. General stormwater runoff from the plant site will drain north to a 2-hectare (5-acre) bermed catchment area which will allow settling out of particulate material prior to discharge into the freshwater marsh.

Construction of the cement manufacturing plant is scheduled to start in the third quarter of 1978 and will last approximately 30 months. The first stage of construction will involve clearing and grading of the access corridor and a site area of about 20 hectares (50 acres). Since the area was logged in 1974, there will be a minimum of large trees to be cleared. About 130,000 cubic meters (170,000 cubic yards) of soil will be moved during the grading period, with cut and fill activities nearly balancing so that there will be only minor amounts of excess excavation material.

Later construction activities will include erection of structures and equipment, installation of utility connections, final grading, and revegetation. Approximately 14,000 to 16,000 piles will be driven to provide adequate foundations for structures. Construction of the docking facility will require dredging approximately 500,000 cubic meters (650,000 cubic yards) of material. This material will be disposed in one of the approved spoil disposal areas to be used for the ship channel project (see Chapter VI for further discussion of the disposal of dredged material).

PLANT OPERATION

The cement manufacturing plant will use a dry process requiring limestone, sand, clay, and iron ore to be ground and mixed in specific proportions. The mixture is fed into a rotating furnace, or kiln, where high temperatures fuse the materials into marble-sized granules called clinker. The clinker is then mixed with gypsum and ground again to form cement. The end product is a fine powder which is shipped primarily in bulk.

Because the manufacturing process involves handling of dry, finely-ground materials, a potential environmental problem is the emission of particulate matter to the atmosphere. Such emissions are controlled by venting dust-laden gas streams through fabric filter collectors known as baghouses, which have very high collection efficiencies. All materials collected by these devices are recycled into the cement manufacturing operation, thus conserving resources and preventing accumulation of solid wastes.

The major components of the proposed dry cement manufacturing process are the following:

1. Raw mills,
2. Regrind mill and kiln feed system,
3. Kiln suspension preheaters,
4. Kilns and precalciners,
5. Clinker coolers, and
6. Finish mills.

The purpose of the raw mill is to dry the raw materials and grind them to a fine consistency to be stored in silos for use in the next area. The drying and grinding is accomplished in airswept mills that utilize the hot exhaust gases from the kiln and clinker cooler circuits, with additional heat provided by separate coal furnaces. After passing through a regrind circuit for fineness control, the raw mix is blended and transported into kiln suspension preheaters which utilize the kiln exhaust gases to heat the material. Just prior to entering the kiln, the raw mix is heated further to about 840°C (1,550°F) in a coal-fired precalciner. This additional heating reduces the equipment size requirements for the kiln. Inside the kiln, the raw mix is thermally transformed into clinker at about 1,480°C (2,700°F). The clinker is dropped from the kiln onto an enclosed grate and cooled with ambient air. The finish mills grind and mix the clinker and gypsum. The plant will produce five grades of portland cement and one masonry cement.

Each day's operation of the plant will require about 9,100 metric tons (10,000 tons) of wet raw materials, primarily limestone, to produce 4,600 metric tons (5,100 tons) of dry cement. Limestone will arrive in tows from Ideal's Gaillard quarry at an average rate of slightly more than one tow per day (on a seven-day-per-week schedule). Some of these tows will include sand and clay barges from Ideal's existing clay quarry at 24-Mile Bend on the Alabama River (see Figure III-1). Iron ore, gypsum, and coal will be obtained from commercial suppliers and delivered by either water or rail.

Electric service will be provided by Alabama Power Company via transmission lines located within the access corridor. Approximately 30 megawatts will be required for normal plant operations. Potable water and make-up water for the plant cooling system will be supplied by the Board of Water and Sewer Commissioners of the City of Mobile at a rate of 1,080 cubic meters (285,000 gallons) per day. Sanitary sewage will be disposed by the municipal sewer system.

The plant will follow a 24-hour-per-day schedule for manufacturing operations, but will average only an 85 percent annual operating rate because of maintenance requirements and other operating factors. A total of 135 workers will be employed at the plant, most of whom will be transferred from the existing Ideal Basic Industries facility in Mobile. The project will create 10 new jobs at Ideal's sand and clay quarry and will require 50 additional workers in marine operations.

Approximately 57.5 percent of all outbound cement shipments will be conveyed by water to Ideal's terminal facilities in Louisiana and Florida. Approximately 31.9 percent of the plant output will be shipped by truck and 10.6 percent by rail, and outside contractors will be utilized in both cases.

SUMMARY OF ENVIRONMENTAL IMPACTS

The impacts of the Ideal Basic Industries project at Theodore on the natural and social environment are summarized in Table III-1. Throughout the impact analysis, the effects of construction and plant operation have been considered separately. Each impact has been rated as low, moderate, or high in terms of magnitude (based on some measurable physical property) and significance (reflecting the importance of the impact relative to expected area conditions). The ratings of duration and reversibility indicate respectively whether the impact will persist longer than several years, and whether the environment can naturally return to existing conditions after the 50-year active life of the project.

The Ideal Basic Industries project includes numerous environmental safeguards that are specifically designed to minimize adverse impacts. The "mitigating measures" noted in Table III-1 are additional steps which could possibly be taken for the purpose of environmental protection. The "alternatives" column indicates possible changes in the project (i.e., actions in place of the proposed action) which would affect environmental impact. These mitigating actions and project alternatives have all been actively considered in the environmental review process.

As indicated in Table III-1, the adverse impacts of the project are found to be of low to moderate magnitude and low significance. Most are unavoidable but reversible. The construction impacts will usually be short-term, whereas the operational impacts will persist throughout the project life. The only irreversible impacts involve the disposal of material dredged from the docking area and the loss of ecosystem values due to site development. The only avoidable impacts relate to the burning of vegetative wastes and the discharging of general stormwater runoff to the freshwater marsh. The project at Theodore will also have positive economic impacts which are not listed in Table III-1. The following discussion presents separately the various categories of environmental quality shown in the table.

Table III-1. Summary of Significant Adverse Environmental Impacts, Proposed Mitigating Measures, and Practical Alternatives (Page 1 of 2)

Action	Phase*	Magnitude	Significance	Reversible	Duration (Term)	Avoidable	Mitigating Measures	Alternatives
PLANT SITE Air Quality								
1. Controlled Burning of Land-Clearing Wastes	C	Low	Low	Yes	Short	Yes	None	On-site burial; firewood; use in pulp mills and waste wood boilers
2. Fugitive Dust	C	Mod	Low	Yes	Short	No	Chemical stabilizers; wind breaks; paving roads	None
3. Particulate Emissions	0	Low	Low	Yes	Long	No	Higher stack heights	Scrubbers; cyclones; electrostatic precipitators; enclosing fugitive dust sources and venting to baghouses
4. Sulfur Dioxide Emissions	0	Low	Low	Yes	Long	No	Lower sulfur fuel	None
5. Nitrogen Oxide Emissions	0	Low	Low	Yes	Long	No	None	None
6. Use of PSD Increment	0	Mod	Low	Yes	Long	No	None	None
Noise								
1. Construction Activities	C	Mod	Low	Yes	Short	No	None	None
2. Plant Operations	0	Mod	Low	Yes	Long	No	Noise suppression on baghouse fans; enclose facilities	Change facility layout to minimize noise impact
Solid Wastes								
1. Landfilling	C	Low	Low	Yes	Long	No	None	On-site burial
2. Disposal of Dredged Material	C	Mod	Low	No	Long	No	None	None†
3. Landfilling	0	Low	Low	Yes	Long	No	None	On-site burial; use as fill
Socioeconomics								
1. Traffic	C	Mod	Low	Yes	Short	No	Reschedule work shifts	None
2. Land Value	C	Mod	Low	Yes	Short	No	None	None
3. Truck Traffic	0	Mod	Low	Yes	Long	No	Reschedule truck shipments	None
4. Land Value	0	Mod	Low	Yes	Long	No	None	None

Table III-1. Summary of Significant Adverse Environmental Impacts, Proposed Mitigating Measures, and Practical Alternatives (Continued, page 2 of 2)

Action	Phase*	Magnitude	Significance	Reversible	Duration (Term)	Avoidable	Mitigating Measures	Alternatives
PLANT SITE, cont.								
Water Resources and Geotechnical								
1. Erosion/Sedimentation from Land Clearing, Grading, and Access Roadway	C	Mod	Low	Yes	Short	No	Minimize slopes; soil stabilizers; buffers; artificial structures	None
2. Dredging	C	Mod	Low	Yes	Short	No	None	None†
3. Oil Spills	C	Low	Low	Yes	Short	No	None	None
4. Oil Spills	O	Low	Low	Yes	Short	No	None	None
5. Wastewater Discharge to Ship Channel	O	Low	Low	Yes	Long	No	Chemical treatment	Discharge to marsh or use outfall in Bay
6. Stormwater Discharge to Freshwater Marsh	O	Low	Low	Yes	Long	Yes	Chemical treatment	Discharge to ship channel or to marsh and ship channel
Ecology								
1. Loss of Pine Forest and Wildlife Habitat	C	Low	Low	No	Long	No	None	None
2. Loss of Wetlands for Access Corridor	C	Low	Low	No	Long	No	None†	Access from Dauphin Island Parkway; bridging the marsh
3. Loss of Habitat for Special Species	C	Low	Low	No	Long	No	None	None
4. Dredging	C	Low	Low	Yes	Short	No	None	None
5. Noise Effects	C	Low	Low	Yes	Short	No	None	None
6. Erosion/Sedimentation	C	Low	Low	Yes	Short	No	None	None
7. Oil Spills	C	Low	Low	Yes	Short	No	None	None
8. Noise Effects	O	Low	Low	Yes	Long	No	No	None
9. Oil Spills	O	Low	Low	Yes	Short	No	None	None
10. Stormwater Discharge to Freshwater Marsh	O	Low	Low	Yes	Long	Yes	None	See Water Resources/ Geotechnical
11. Wastewater Discharge to Ship Channel	O	Low	Low	Yes	Long	No	No	See Water Resources/ Geotechnical

* Phases: C = Construction
O = Operation

† See modifications discussed in Chapter VI.

Source: Environmental Science and Engineering, Inc., 1978

AIR QUALITY

Mobile County is an industrialized urban area with over 180 permitted sources of air pollutants and numerous population-related sources (e.g., automobiles, home heaters). Ambient air quality in Mobile County has improved since 1972, due largely to the development and implementation of an Air Quality Maintenance Plan for the area. Average suspended particulate matter concentrations have declined by 33 percent since 1972 at stations monitored by the Mobile County Board of Health. However, two sectors in downtown Mobile and north of Mobile have been designated as non-attainment areas relative to the National Ambient Air Quality Standards for suspended particulate material. Sulfur dioxide levels do not exceed standards in Mobile County and are substantially lower in the Theodore Industrial Park area than in downtown Mobile. Three monitoring stations for suspended particulate matter have been established near the Ideal plant site as part of the present environmental review. The findings indicate that air quality (in the industrial park area) is within state and federal standards.

The Ideal Basic Industries cement plant at Theodore can potentially affect air quality in the following ways:

1. Open burning of vegetative wastes during construction;
2. Fugitive dust emissions during construction;
3. Process emissions of pollutants during plant operation;
4. Fugitive dust during operation (e.g., from conveyors, loading, unloading, etc.).

The environmental safeguards which will be employed in each of these cases to minimize air quality impact are discussed in the following paragraphs.

1. To limit smoke emissions, the burning of land-clearing wastes will be performed with an air-blower type pit burner. Burning will be conducted only during favorable dispersion conditions, and chipping of vegetative waste for use as mulch will be substituted for burning when feasible.

2. Fugitive dust emissions during construction will be reduced by the use of water sprays on roads and other areas where heavy equipment is operated. The main access road will be surfaced as soon as possible to minimize dust potential.

3. Process emissions of particulate matter and sulfur dioxide will be within allowable state and federal levels and will comply with the Prevention of Significant Deterioration (PSD) requirements. The use of baghouses (fabric filter dust collectors) on all process exhausts and the burning of 1.5 percent sulfur coal by weight represent the use of Best Available Control Technology (BACT) for this project. Typically, a baghouse reduces the amount of particulate matter emitted to the atmosphere by greater than 99 percent.

4. Potential fugitive dust emissions will be suppressed by the use of water spray systems at potential source areas such as conveyor transfer points and barge unloading areas. Other factors limiting dust emissions will be the high moisture content of most raw materials and the enclosure of some storage piles and transfer points.

The design of the cement plant has inherent features which will reduce the potential for air pollutant emissions. The use of low sulfur coal and the overall fuel economy achieved by the dry manufacturing process will minimize sulfur dioxide emissions. These emissions will also be reduced by up to 75 percent through the contact of sulfur dioxide with the alkaline raw materials in the baghouse exhaust system.

In addition to sulfur dioxide and particulate material, the plant will emit nitrogen oxides (due to oxidization of nitrogen from the atmosphere) and relatively small quantities of hydrocarbons and carbon monoxide. Direct control of nitrogen oxides is not available, but emissions can be limited by proper control of process parameters.

The impacts of plant construction upon ambient air quality in the vicinity of the site are rated low in significance (see Table III-1).

Fugitive dust emissions during construction will be moderate in magnitude but will have limited significance since most of the fugitive dust particles will settle out close to the source. The additional mitigative measures available (chemical soil stabilizers, windbreaks, and paving of all construction roads) have been found impractical for use in the project. Smoke emissions from burning of land-clearing debris will represent an impact of low magnitude because of the use of an air-blower type pit burner.

In the plant operation phase, the emissions of hydrocarbons, carbon monoxide, and fugitive dust will represent negligible impacts due to the small quantities involved. Computer modeling has indicated that nitrogren oxide levels will remain well below the National Ambient Air Quality Standards, so that the emission of these substances will constitute an impact of low magnitude and significance.

The impacts involving process emissions of suspended particulates and sulfur dioxide have been evaluated in terms of the Prevention of Significant Deterioration (PSD) review process. This process requires a demonstration that Ambient Air Quality Standards will not be exceeded at any location and that the project will not cause violations of allowable federal increments in air quality (relative to baseline conditions in 1974). In the PSD analysis, computer modeling of pollutant dispersion was used to forecast concentrations at numerous locations near the plant site under various meteorological conditions. The analysis has considered other pollutant sources besides the Ideal Basic Industries cement plant and has utilized conservative assumptions which, with the modeling employed, would tend to overestimate Ideal's impact.

The PSD review has shown that Ambient Air Quality Standards will not be exceeded by the Ideal project and that the cement plant will utilize between 6 percent and 62 percent of the allowable air quality increments (at the point of maximum Ideal impact). The greatest utilization of an increment by Ideal will involve the 24-hour suspended particulate concentration. The smallest increment share remaining (12 percent) after

Ideal uses 31 percent of the increment will be for 24-hour sulfur dioxide concentration. The Ideal emissions of suspended particulate matter and sulfur dioxide are rated low in magnitude and significance as environmental impacts on both a long-term (annual) and short-term (24-hour/3-hour) basis.

The air quality modeling results have been examined further to determine whether the Ideal project might affect future industrial growth in the Theodore Industrial Park area, by reducing the availability of air quality increments to other potential manufacturers. The analysis indicates that Ideal's greatest effects on available increments tend to involve locations and meteorological conditions which would not be relevant for new industries occupying the presently undeveloped portions of the park. Thus, no significant barriers to future growth are anticipated. The utilization of air quality increments by Ideal is rated moderate in magnitude but low in significance as an environmental impact.

The only mitigative measures which could further reduce the impacts of Ideal's process emissions would be the use of lower sulfur coal and the use of tall stacks on all emission points rather than just the exhaust streams from the kiln/cooler/raw mill system. The first of these measures is not economically justifiable due to the inherent process reduction of sulfur dioxide emissions, and the second is impractical given the nature and spatial distribution of pollutant sources. There are several project alternatives that would affect pollutant emissions; i.e., the use of electrostatic precipitators or wet scrubbing devices rather than baghouses and the substitution of a wet manufacturing process for the dry process. The wet process is relatively undesirable because of energy, environmental, and maintenance factors. The use of air pollution control systems other than baghouses would involve greater operating problems without adding to collection efficiency.

NOISE

Standards and criteria do not exist for environmental noise in the same sense as for water and air quality, but the U.S. EPA has suggested noise levels requisite to protect the public against hearing loss or activity interference. The maximum level recommended for residential and institutional land uses is the threshold at which noise could interfere with normal outdoor activities such as speech communication at about 3 meters (10 feet). The maximum noise level recommended for commercial and industrial land uses is the value which could cause a hearing loss after 40 years of continual exposure.

Baseline noise monitoring has been conducted at 12 stations near the Ideal Basic Industries plant site. Generally moderate noise levels have been observed. Only two stations exceeded the EPA-recommended maximum levels, both because of traffic on Island Road (also known as Hamilton Boulevard).

Construction of the Ideal Basic Industries cement plant will generate noise by the use of heavy equipment for earthmoving, lifting, welding, paving, pile driving, and transportation. The noise sources during plant operation will include process equipment, material handling, water and rail transportation, and vehicular traffic. The noise effects in both cases have been modeled mathematically to evaluate the impacts of the project on surrounding areas. Two important factors which affect the impact assessment are that: (1) construction of the Theodore Ship Channel by the Corps of Engineers may take place at the same time as the Ideal construction project; and (2) the number of noise-sensitive residential land uses near the plant site will diminish because of land takings for the ship channel project and other land conversions.

The analysis indicates that the EPA-recommended noise levels will be exceeded at 8 of the 12 monitoring sites during the Ideal construction phase. Approximately 60 occupied dwelling units will be affected (although only slightly in many cases). Permanent operations at the cement plant will affect a somewhat smaller area. In this case recommended noise levels will be exceeded only at the home sites located immediately across the ship channel and the Dauphin Island Parkway from the Ideal property. Roughly 20 dwellings will be affected in 1981, with the number declining to about 6 in 1992 due to land use conversions. The noise impacts of both construction and operation of the Ideal facility are rated moderate in magnitude but low in significance due to the limited number of potential receptors.

Noise effects of the project will be minimized by the use of effective noise suppression devices on contruction equipment, by the enclosure of most process machinery, and by the location of site features such as the access road, limestone storage area, and vegetated buffer strip. An additional mitigative action would be the inclusion of noise suppression equipment on baghouse fans. This measure and several project alternatives are presently under study for possible implementation, but the prospects for further noise reduction appear limited.

SOLID WASTE

Vegetative wastes will be generated by the clearing of 20 hectares (50 acres) of modified longleaf pine forest during construction at the plant site. This material will be disposed by: (1) chipping and use for mulch and erosion control; (2) burning in an air-blower type pit burner; and/or (3) transport to the Irvington Landfill for burial. Other construction wastes will be conveyed to the Irvington Landfill by a private contractor. This landfill is owned by Mobile County, utilizes a trench method of disposal, and has an active life exceeding 15 years. About 500,000 cubic meters (650,000 cubic yards) of soil will be dredged from the waterfront area and transferred to the disposal sites used by the Corps of Engineers for the ship channel project (see Chapter VI for further discussion of the disposal of dredged material).

Permanent operations at the cement plant will yield approximately 1,043 metric tons (1,150 tons) of solid waste per year, the largest portion being refractory materials from the kilns and suspension preheaters. Other wastes will include reject raw materials, waste paper, scraps, oily maintenance waste, and sediment removed from the stormwater catchment area and wastewater settling basin. All of these wastes, with the exception of recyclable materials, will be hauled to the Irvington Landfill. No disposal problems are anticipated other than the utilization of available landfill capacity. Thus, the impact of landfilling is rated low in magnitude and significance during both the construction and operation phases. The disposal of dredged material from the waterfront is an impact of moderate magnitude but low significance since an approved site will be used (see Chapter VI for further information).

Alternatives for the disposal of vegetative waste during construction include on-site burial or sale for use as firewood, paper pulp, or fuel. Burial would create soil stability problems, whereas the other options would create extra commitments of time and money during the beginning of the construction schedule. On-site burial could be utilized for most of the solid wastes generated during permanent operations, but would be impractical relative to the use of centralized disposal facilities at Irvington. However, the waste refractory bricks and sediment could be utilized as construction fill material if acceptable areas were found.

WATER RESOURCES

The surface water bodies of primary importance for the proposed project are the Theodore Barge Canal, to be replaced by the Theodore Ship Channel, and the North Fork Deer River. The barge canal was created in 1968 by dredging the Deer River bed to a depth of 3.7 meters (12 feet) and a width of 90 meters (300 feet). Some sections of the river that were bypassed now remain as marshy bayous. The dead-end barge canal extends inland a distance of 3.2 kilometers (2 miles) and receives little freshwater inflow because of its limited drainage area. As a result, there is relatively little water circulation, which permits stagnant bottom conditions and severe oxygen depletion to occur, especially during the summer months when salinities in the barge canal and bay are high.

The Theodore Ship Channel project will create a waterway of 12-meter (40-foot) depth and 90-meter (300-foot) bottom width along the route of the existing barge canal, with a 17-hectare (42-acre) turning basin near Rangeline Road and an extension of the barge canal farther inland. It is anticipated that water quality problems in the ship channel will resemble those in the existing waterway.

The North Fork Deer River crosses the Ideal property and is bordered by marshes. During construction of the cement plant, storm events will erode the land surface in cleared areas, and rainfall runoff will convey sediment from these areas to both the barge canal and the marshes bordering the North Fork. (Approximately two-thirds of the land to be developed drains to the north.) As a safeguard against turbidity and sediment effects, a catchment area will be constructed early in the project by placing two berms near the border of the marsh. This facility will reduce sediment loadings by providing temporary detention storage and will permit dispersed flow into the freshwater portion of the marsh system. Additional stormwater treatment will be provided by the filtering action of the marsh vegetation. The plant site will be graded during construction so that the developed land drains into this catchment area, and the catchment will be retained after the plant is in operation as a control for general site runoff. Another safeguard against erosion/sedimentation will be the use of berms and barriers for soil stabilization during the construction of the access corridor across the freshwater marsh. Surfacing of access roadways and mulching with wood chips will help to reduce erosion elsewhere.

Industrial wastewater will come from four sources at the cement plant during permanent operations: (1) rainfall runoff from the uncovered raw material piles; (2) runoff from the bermed area around the oil tank; (3) process cooling tower blowdown; and (4) truck and car wash and floor washes. Chemical analysis and fish bioassays have shown that the stockpile leachates will be nontoxic and, when diluted with the other wastewaters, will be of acceptable water quality meeting Alabama Fish and Wildlife Standards. An important environmental safeguard (not considered in the toxicity analysis) will be the fact that most material storage piles will be covered rather than exposed to rainfall. The cooling system blowdown will contain dissolved solids and an algicide which must be approved by EPA when a final selection is made. These industrial wastewaters will be treated in a settling basin facility of 16-million-liter (4.2-million-gallon) capacity, located at the southwest corner of the plant site. The facility will be designed to meet the effluent requirements established by NPDES permitting, and will discharge to the ship channel at a controlled rate averaging approximately 341,000 liters (90,100 gallons) per day.

The water quality impacts of erosion/sedimentation during the construction phase will be moderate in magnitude, but low in significance because of their short duration and reversibility. Mitigative measures in addition to the safeguards already discussed are not considered necessary to achieve adequate environmental protection. The dredging activity at the barge canal/ship channel waterfront will create localized turbidity effects, which are also attributed moderate magnitude and low significance. Fuel oil spills conceivably could occur during either the construction phase or the operations phase of the project. The probability of water quality impact from this source is very low, however, due to site characteristics and the use of containment berms.

The impact of discharge of process wastewaters from the settling basin to the ship channel during plant operation is attributed low magnitude and significance because the effluent will meet all applicable water quality standards. Two possible project alternatives would be to discharge this effluent into the freshwater marsh or to utilize the proposed common wastewater outfall in Mobile Bay. The former step would risk overloading the assimilative capacity of the marsh system. The latter alternative does not appear necessary as an environmental protection measure. General stormwater runoff from the plant site during the operation phase likewise is predicted to have low magnitude and significance as a water quality impact, given the treatment provided by the catchment area and marsh system. A potential project alternative would be to deliver part of this runoff to the ship channel rather than the North Fork Deer River. This alternative would contribute to the flushing of a limited segment of the ship channel, and would be acceptable environmentally so long as the flow to the marsh was not reduced below existing levels. However, such a plan would be impractical because of the resulting need to construct a stormwater catchment area in the southern portion of the site, which does not contain sufficient undeveloped land.

ARCHAEOLOGY

The archaeological-historical inventory of the Ideal Basic Industries property at Theodore included a review of all pertinent data sources and a survey conducted under the supervision of the University of South Alabama. The investigation indicates that no sites of archaeological-historical interest will be impacted by either construction or operation of the proposed cement plant. The Alabama Historical Commission, State Historic Preservation Office, has concluded that the development will have no adverse effect on any cultural resources included in, or eligible for, the National Register of Historic Places (see Appendix F). However, in the event that a site of potential interest is uncovered during construction, the Commission will be notified to appraise the discovery.

ECOLOGY

The two major vegetative communities found at the proposed plant site are the modified longleaf pine forest and the marshland bordering the North Fork Deer River (see Figure III-5). The upland areas have an overstory of longleaf pine, with a well-developed understory of hardwoods. Past timbering activity has reduced most of these areas to a disclimax shrub and early forest growth state. The lowland portions of the site include a tidally-influenced brackish marsh, a freshwater marsh, and an

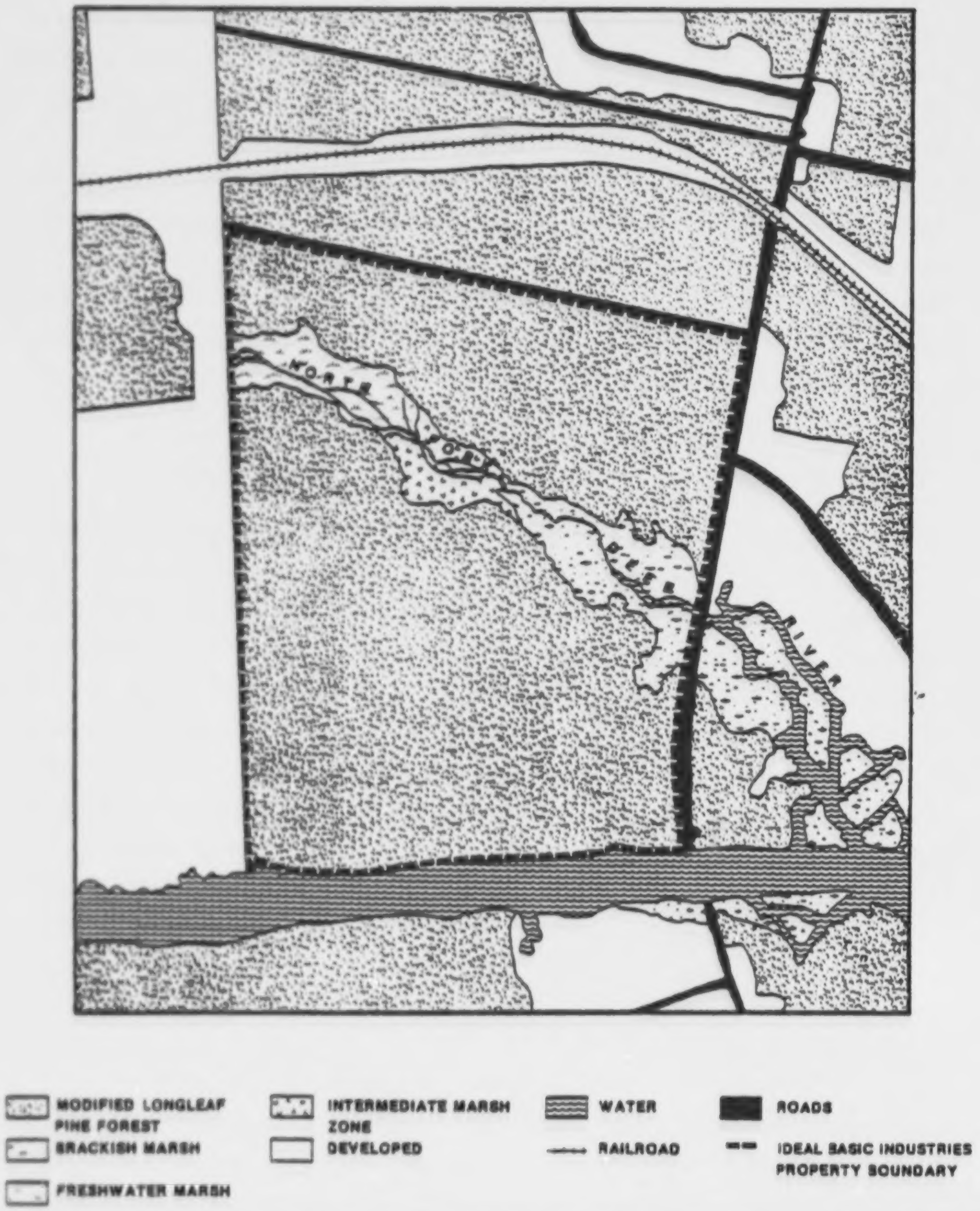

NORTH FORK DEER RIVER
MODIFIED LONGLEAF PINE FOREST
BRACKISH MARSH
FRESHWATER MARSH
INTERMEDIATE MARSH ZONE
DEVELOPED
WATER
RAILROAD
ROADS
IDEAL BASIC INDUSTRIES PROPERTY BOUNDARY

Figure III-5
VEGETATION MAP FOR THE PROPOSED PLANT SITE

0 SCALE IN METERS 300

SOURCE: Environmental Science and Engineering, Inc., 1977.

REGION IV
U.S. ENVIRONMENTAL PROTECTION AGENCY ENVIRONMENTAL IMPACT STATEMENT FOR IDEAL BASIC INDUSTRIES

PROPOSED CEMENT MANUFACTURING PLANT THEODORE INDUSTRIAL PARK
MOBILE, ALABAMA

intermediate forested area of somewhat higher land. The brackish marsh is composed primarily of sawgrass, whereas the intermediate marsh is characterized by the presence of small overstory species. Upstream from the intermediate zone, overstory species become sparse and are replaced by grasses and other low-lying vegetation. Near the western property boundary the marsh vegetation is almost entirely cattail and reeds.

The animal community in the longleaf pine upland area is characterized by a number of exclusives (species occurring in a single habitat), which include nuthatches, warblers, squirrels, flatwoods salamanders, and black pine snakes. The animal species most frequently observed are cardinals, quail, doves, red-bellied woodpeckers, raccoons, and rabbits (cottontail and swamp). An aquatic-associated group of birds, mammals, reptiles, and amphibians are represented on the site because of the presence of wetland areas. Species such as marsh wrens, rails, rice rats, nutria, and salt marsh snakes are exclusives which are adapted to the periodic inundation of marsh vegetation. Other species (e.g., barn owls, fish crows, raccoons, and skunks) utilize the marsh along with a wide variety of other habitats. The most commonly observed vertebrate animals are swallows, snipe, sharptailed sparrows, and red-wing blackbirds.

The field surveys of plant and animals species have devoted special attention to commercially and recreationally important forms and rare and endangered species. The plant site is not considered a major hunting or fishing area, and presently has very limited forest resources of commercial importance. However, the site has suitable habitat for some fur-bearing animals and game species.

One threatened species (the American alligator) and two species of special concern (merlin and little blue heron) have been observed in the marsh area. On the basis of habitat analysis, 12 additional special-status animal species are considered likely to occur at the site. Ten of these species would be found in the marsh or swamp area.

A similar analysis of plant species has identified 4 endangered species and 11 threatened species that are known to occur in Mobile County habitats resembling the plant site. None of these plant species has been observed at the site, and all except one (*Ludwigia arcuata*, a marsh plant) are assigned a low probability of occurrence due to recent logging of the upland area.

The two relevant aquatic ecosystems are the North Fork Deer River and the barge canal. The North Fork is a tidal stream roughly 20 feet wide near the center of the Ideal property, but the channel disappears entirely in the intermediate forested zone between the freshwater and brackish marshes. Due to the cleansing action which appears to take place in this area, water quality in the North Fork estuary is relatively good. Available data suggest that the aquatic fauna is comparable to that of other marshy creeks bordering Mobile Bay. The barge canal, however, has a reduced fauna due to its depth and lack of flushing, which lead to stagnation and oxygen depletion.

The ecological impacts of the Ideal Basic Industries project at Theodore are generally rated low in magnitude and significance (see Table III-1). The loss of modified pine forest from the site area will have minor ecological importance due to the presently disturbed condition of the forest. The reduction in possible upland habitat for special-status species is an impact of low magnitude and significance because of the low probability that these species occur on-site, and the availability of similar habitat elsewhere.

The proposed project will not disturb any portion of the brackish marsh, but the crossing of the access corridor will disturb about 0.5 hectare (1.2 acres) of the freshwater marsh [total area 3.0 hectares (7.3 acres)]. However, only about 0.2 hectare (0.5 acre) of marsh area will be filled to construct the roadway bridge. This loss of wetland, involving a reduction of possible habitat for the river frog (special concern status) and other wetland-associated species, will be low in magnitude and significance as an ecological impact due to the small area involved (see Chapter VI for further discussion of wetlands).

A relevant project alternative in this case would be to provide a trestle across the entire wetland (as in the case of the railroad trestle) rather than just a 15-meter (50-foot) section. However, the benefits of this alternative would not justify the added expense involved. Other routes for the access road either are impractical or would cause greater ecological damage.

The impacts on the marsh system of stormwater disposal during construction and operation of the cement plant are expected to be low in magnitude and significance because of the treatment provided by the catchment area. Erosion/sedimentation impacts may occur before the catchment area is completed, but these effects should be of minor significance.

The potential effects of dredging, oil spills, and process wastewater discharges on water quality have already been mentioned. None of these factors is expected to have other than low magnitude or significance as impacts on aquatic ecosystems. The primary reasons are the short duration of dredging, the low probability of oil spills, and the favorable composition of the wastewater effluent relative to the water already present in the barge canal and ship channel.

SOCIOECONOMICS

The Ideal Basic Industries project at Theodore will have very substantial positive impacts upon economic conditions in Mobile County. There will be an average employment of 360 workers at the plant during the 30-month construction period, drawing a total payroll of $15,000,000 in 1977 dollars. The 135 permanent employees at the plant will earn roughly $3,000,000 per year including fringe benefits. Related marine operations will involve 50 workers who may or may not be Ideal employees.

The project at Theodore could possibly accelerate the closing of the existing Ideal Basic Industries cement manufacturing plant in Mobile. However, even under the worst-case assumption that the Mobile plant closing will be advanced by five years relative to conditions without the new facility, the Theodore project will create a net employment gain of at least 5,500 person-years of employment between 1978 and 1992 (an average of 393 jobs) when indirect effects are taken into account. These positive economic impacts are considered high in magnitude and moderate in significance.

Most construction workers on the project will be hired locally. Thus, the construction phase is not expected to have significant effects upon the housing market, public facilities, or social conditions. The project will increase the daily traffic flows on various portions of Island Road (Hamilton Boulevard) by 3.6 percent to 8.3 percent at the time of peak construction. The overall traffic impacts of construction are considered moderate in magnitude, but low in significance due to the anticipated completion of major improvements to Island Road and its intersection with Rangeline Road. The principal mitigative measure available to minimize these impacts would be to reschedule and possibly stagger the construction work shifts. This will probably not prove to be feasible.

Cement shipments from the proposed plant will generate a substantial volume of truck traffic, amounting to an average of about 75 round trips per day (based on a 5-day per week shipment schedule). The effects of this truck volume on highway congestion and hazards will be significantly reduced in 1982 by the completion of Rangeline Expressway, linking Rangeline Road and Island Road to Interstate 10 and U.S. Route 90. The long-term impacts of truck traffic will be moderate in magnitude and low in significance. The other transportation requirements of the cement manufacturing plant are not expected to involve appreciable effects on the human environment.

The construction and operation of the Ideal facility could have both positive and negative effects upon land value in nearby areas. The positive effects would relate to employment opportunities at the plant and the general stimulus to economic growth in the industrial park area.

The negative effects would possibly involve dust, noise, and aesthetic impacts. The marketability of residences in the area surrounding the cement plant is generally good because of the demand for housing from industrial workers. Most of the homes which would be subject to appreciable impact by Ideal will be taken for the ship channel project, or else will be sold because of their high value for industrial use. Ideal's impact on land values will be of moderate magnitude for some remaining residences, but the significance will be low due to the small number of properties involved. The major environmental safeguards which will minimize this impact have already been mentioned in connection with air and noise effects.

QUARRY SITE

LOCATION AND CHARACTERISTICS

The Ideal Basic Industries limestone quarry site is located on the eastern bank of the Alabama River in Monroe County, Alabama, approximately 180 kilometers (110 river miles) north of the Theodore plant site. This 1,633-hectare (4,035-acre) tract consists of two land parcels under different ownership (see Figure III-6). The 739-hectare (1,826-acre) northern portion was purchased by Ideal Basic Industries in 1953 and 1959, and until recently consisted of timberland. The southern portion of 894 hectares (2,209 acres) is owned by Mr. Howard McWilliams, a cattle rancher. Recent agreements between the two owners have allowed Mr. McWilliams to harvest timber and develop most of the Ideal Basic Industries property as improved pasture, while Ideal Basic Industries has acquired quarrying rights to the McWilliams property. The conversion of land to improved pasture, which is already underway, is an independent action not covered by this Environmental Impact Statement.

The quarry site borders Stockton Road (Monroe County Road No. 1) and is very isolated relative to other developed land. Except for a few houses situated along Stockton Road, the only land uses found within 5 kilometers (3 miles) of the central portion of the site are agriculture and woodland. There are no houses within 1 kilometer (0.6 mile) of the area to be quarried during the first 15 years. The southern half of the site itself consists largely of improved pasture with some fodder crops. The north-central portion has been recently cleared and is in transition to improved pasture. North of this area and along the bank of the river are thinned hardwoods. Although the harvesting of timber has been irregular, all of these areas are fenced and accessible to grazing cattle.

There are four creeks which flow across the site into the Alabama River. From north to south they are: McGirts Creek, Thompson Mill Creek (also known as Marshalls Creek), Hollinger Creek, and Randons Creek. These creeks, which are shallow with sand/gravel bottoms, flow in a southwest

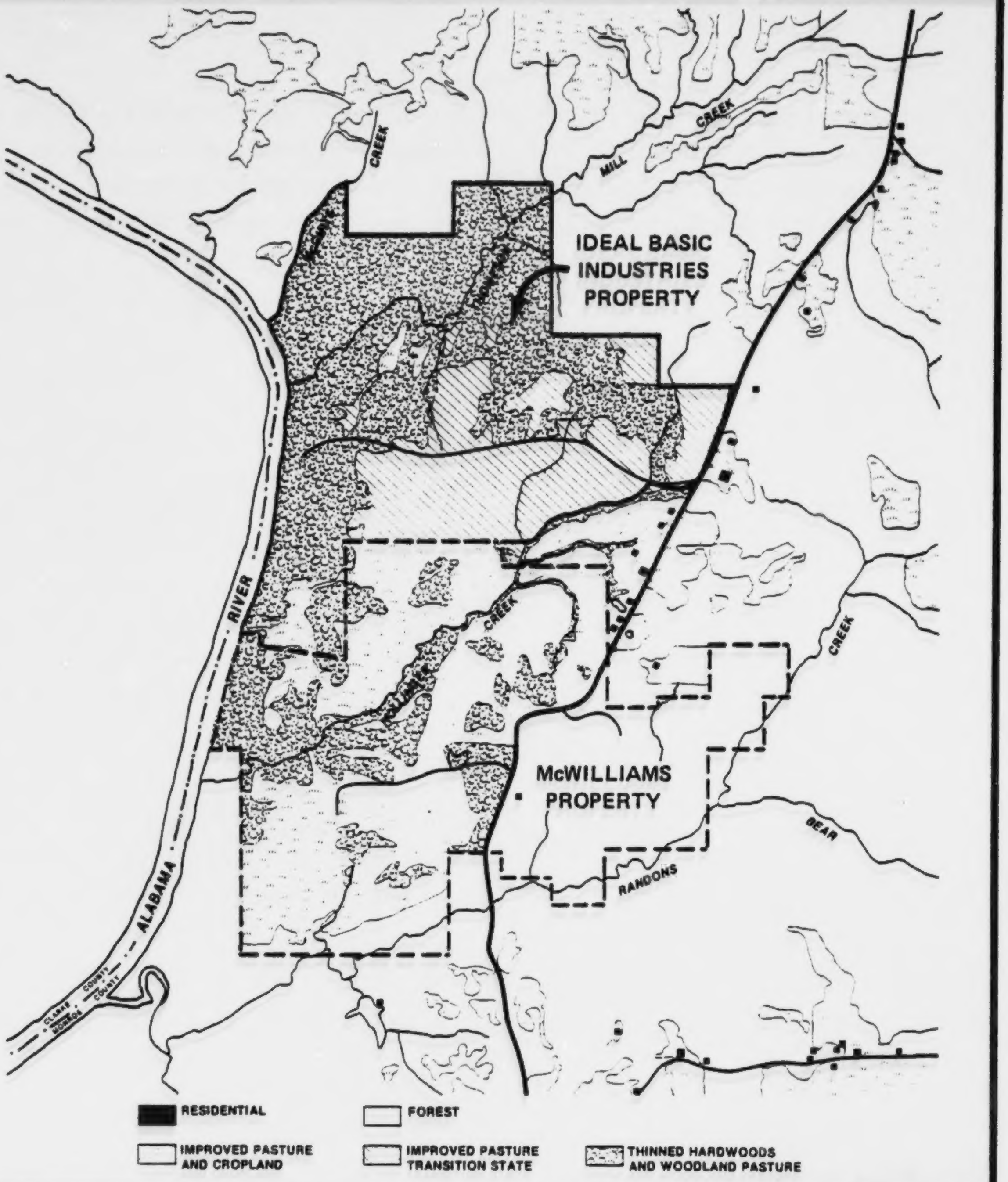

CREEK
MILL
CREEK
IDEAL BASIC
INDUSTRIES
PROPERTY
RIVER
CREEK
CREEK
McWILLIAMS
PROPERTY
BEAR
RANDONS
ALABAMA
CLARKE COUNTY
MONROE COUNTY
RESIDENTIAL
FOREST
IMPROVED PASTURE AND CROPLAND
IMPROVED PASTURE TRANSITION STATE
THINNED HARDWOODS AND WOODLAND PASTURE

Figure III-6
PRESENT LAND USE IN THE VICINITY OF THE PROPOSED IDEAL BASIC INDUSTRIES QUARRY SITE

0 0.5 1
SCALE IN KILOMETERS

N

SOURCE: Environmental Science and Engineering, Inc., 1977.

REGION IV
U.S. ENVIRONMENTAL PROTECTION AGENCY ENVIRONMENTAL IMPACT STATEMENT FOR IDEAL BASIC INDUSTRIES

PROPOSED GAILLARD QUARRY
MONROE COUNTY, ALABAMA

direction. Bluffs and outcrops occur along the western boundary of the property adjacent to the river, but the relief moderates considerably to the east. The geology of the area is characterized by layers of limestone overlaid by sand and gravel deposits of varying thickness.

PROJECT DESCRIPTION

CONSTRUCTION

The limestone quarry facility will be constructed in 18 months at a cost of $12,000,000 in 1977 dollars. About 40 hectares (100 acres) will be cleared initially for construction of the access road, main buildings, and stockpile area. Most of the overburden will be utilized to construct earthen dams for clarification basins. These basins will be the primary means of sediment control utilized in the quarry project.

Conveyors and limestone breakers will be set up in the immediate vicinity of the limestone storage area. Construction of a docking facility on the Alabama River will not require dredging, as the depth of the river in this area is already adequate. The project will include construction of a 38,000-liter (10,000-gallon) underground diesel fuel tank and an underground gasoline storage tank of approximately 23,000 liters (6,000 gallons).

QUARRYING PROCESS

The proposed quarry will extract 2.4 million metric tons (2.7 million tons) of limestone (wet basis) per year from an average of 14 hectares (35 acres) of land. Up to 80 percent of the site can be mined economically with present quarrying techniques. The recoverable reserves exceed 136 million metric tons (140 million tons). Thus, the effective life of the facility is greater than 50 years.

The overall quarrying process will involve overburden removal, quarrying, crushing, storage, barge loading, and land reclamation. Soil overburden will be removed by dozers and scrapers in order to expose the underlying layers of limestone. The overburden will be taken to storage areas, used directly in land reclamation, or used to construct dams for clarification basins. Overburden storage areas will be seeded where practical. Depending upon the mining sequence chosen, material may accumulate in these areas for up to 5 years until an equilibrium between mining and reclamation is reached. Thereafter, quarrying and land reclamation will proceed at equivalent rates in terms of acreage and the quantities of overburden handled.

Quarry activities will begin with the processing of materials stockpiled during construction and will move progressively away from the stockpile area. Dozers with special ripping equipment will be used to loosen the limestone and push it down slope; blasting is not anticipated. A total of up to 120 hectares (300 acres) will be involved in active quarrying and overburden storage at any given time. All stormwater runoff from unvegetated land will be directed to the clarification basins situated in low-lying areas.

Front-end loaders, rippers, and dozers will convey the limestone to a portable breaker located near the quarry face. The limestone will be crushed and then conveyed either to storage or directly to the barge-loading facility. Every 20.5 hours a set of four barges will leave for the cement plant. Unlike the quarrying operations, which normally will be limited to a 40-hour work week, barge loading may require two 8-hour shifts per day.

LAND RECLAMATION

The objective of the land reclamation program will be to grade and vegetate the quarried area for use as pastureland (which will represent the most recent use prior to quarrying in most cases). The program will emphasize control of stormwater runoff and soil erosion, development of wildlife habitat, and monitoring of environmental quality. Soil on reclaimed land will be compacted to ensure soil stability, and graded to minimize erosion. Contour grading will be used on the steeper slopes when necessary. Reclaimed areas will be seeded and will be drained into clarification basins until the area is revegetated.

The removal of limestone will lower the land elevations in quarried areas by an average of 7.6 meters (25 feet). The cumulative effect of quarrying and reclamation will be a moderate reduction in land surface gradients. Transitional zones between disturbed and undisturbed areas will be graded to minimize slope differences, with no slopes exceeding 3 to 1.

RESOURCE UTILIZATION

The quarry will have 4.18 kilovolt electric service supplied by the Alabama Electric Cooperative or the Alabama Power Company and will utilize 3.0 megawatts of electricity. An aboveground transmission system will be located within the access roadway corridor. Potable water for sanitary facilities will be supplied by a deep well with a pumping capacity of 40 liters (10 gallons) per minute. Water for dust suppression will be obtained from the clarification basins. The quarry will generate about 1,800 liters (475 gallons) per day of sewage which will be disposed on site by means of a septic tank and soil absorption system.

SUMMARY OF IMPACTS

The environmental impacts of the Ideal Basic Industries quarry project in Monroe County are summarized in Table III-2. The ratings in terms of magnitude, significance, reversibility, duration, and avoidability are similar to the summary for the plant site (Table III-1). The impacts of construction and operation are generally considered separately.

Virtually all of the impacts occurring at the quarry site are considered low both in significance and magnitude. Three important factors are the isolation of the site, the land conversions that have already taken place, and the extensive use of environmental safeguards (to be noted below in the appropriate subject area discussions). All impacts of the quarry project are considered reversible except the changes produced in topography, drainage, and groundwater flow patterns. The impacts are long-term with the exception of soil erosion, noise, dust, and smoke emissions produced during construction. The only avoidable impact is the emission of combustion products due to pit burning of vegetative matter.

AIR QUALITY

There are several stationary sources of air pollutants in Monroe and Clark Counties, but the only sources within 24 kilometers (15 miles) of the quarry site emit very small quantities of particulate matter. Ambient concentrations of air pollutants at the site should approach background levels (zero for sulfur dioxide, 20 to 30 micrograms per cubic meter for suspended particulate matter). Pollutant concentrations at the site may increase slightly in the near future due to the opening of a pulp mill approximately 11 kilometers (7 miles) to the north.

Construction activities at the quarry site, such as land clearing, grading, roadway construction, and excavation, will be potential sources

Table III-2. Summary of Significant Adverse Environmental Impacts, Proposed Mitigating Measures, and Practical Alternatives: Quarry Site

Action	Phase*	Magnitude	Significance	Reversible	Duration (Term)	Avoidable	Mitigating Measures	Alternatives
QUARRY SITE Air Quality								
1. Fugitive Dust	C	Low	Low	Yes	Short	No	Chemical stabilizers; wind breaks	None
2. Controlled Burning of Vegetative Wastes	C	Low	Low	Yes	Short	Yes	None	Landfilling; on-site burial
3. Fugitive Dust--Quarry Area	O	Mod	Low	Yes	Long	No	Chemical stabilizers	None
4. Fugitive Dust--Other Areas	O	Low	Low	Yes	Long	No	None	Enclosing and venting to control devices
Noise								
1. Construction Activities	C	Low	Low	Yes	Short	No	None	None
2. Plant Operation	O	Low	Low	Yes	Long	No	None	None
Solid Waste								
1. Landfilling	C	Low	Low	Yes	Long	No	None	On-site burial
2. Landfilling	O	Low	Low	Yes	Long	No	None	On-site burial
Water Resources and Geotechnical								
1. Erosion and Sedimentation	C	Low	Low	Yes	Short	No	Greater use of erosion controls	None
2. Discharge of Runoff	O	Low	Low	Yes	Long	No	None	Vegetative buffers; quarry pit storage
3. Drainage	O	Low	Low	No	Long	No	None	None
4. Groundwater	O	Low	Low	No	Long	No	None	None
Ecology								
1. Loss of Existing Vegetation	C&O	Low	Low	Yes	Long	No	None	None
2. Loss of Habitat for Existing Species	C&O	Low	Low	Yes	Long	No	Create ecological blend areas	None
3. Loss of Habitat for Special Species	C&O	Low	Low	Yes	Long	No	None	None
4. Erosion and Sedimentation	C&O	Low	Low	Yes	Long	No	None	None
5. Dust and Noise Effects	C&O	Low	Low	Yes	Long	No	None	None
6. Topography and Drainage	O	Low	Low	No	Long	No	None	None
7. Waterway Traffic	O	Low	Low	Yes	Long	No	None	None

*Phases: C = construction
O = operation

Source: Environmental Science and Engineering, Inc., 1978.

of fugitive dust. Other pollutants will be emitted by vehicular exhausts and the burning of vegetative wastes. During permanent operations, fugitive dust may result from the processes of quarrying, crushing, conveying, storing, and loading of limestone.

Water spraying for purposes of dust control will be utilized during both the construction and operation phases of the quarry project. However, the limestone naturally contains 22 percent moisture which will reduce fugitive dust potential. As another safeguard against fugitive dust, the main access road will be surfaced as soon as possible. The use of "boot" type loaders at the barge loading facility will lessen dust emissions, as will the policy of revegetating non-active areas. Because of these measures, fugitive dust during the construction phase and dust generation during the operation phase from all activities other than quarrying are attributed low magnitude and significance as environmental impacts. Quarrying is differentiated because water sprays cannot be utilized effectively in the quarry areas. Fugitive dust from quarrying is considered an impact of moderate magnitude, but low significance because of the isolation of the area (lack of receptors).

Air pollutant emissions from the burning of vegetative wastes during construction will be limited by the use of an air-blower type pit burner, the restriction of burning to periods of favorable atmospheric conditions, and the chipping of vegetative wastes for use as mulch whenever possible. This impact is expected to have low magnitude and significance.

The only additional mitigative measure that could affect air pollutant emissions would be the use of chemical stabilizers and wind breaks to control dust generation from land other than the active quarry area.

The available project alternatives pertaining to air quality include:
(1) landfilling of vegetative wastes on-site rather than burning;
(2) transporting these wastes to the Monroe County landfill; and
(3) enclosing the limestone conveyors and providing baghouse control.
On-site burial of vegetation would result in additional land disturbance

and long-term instability due to decomposition, whereas use of the Monroe County landfill would involve an 80-kilometer (50-mile) round trip. The option of enclosing the conveyors would be unwarranted since the dust generation from these facilities is expected to be low.

NOISE

The only existing noise sources at the quarry site are wildlife, natural phenomena such as wind and water, infrequent river traffic, and a light-duty public road that crosses the extreme eastern section of the tract. Monitoring has indicated that the present noise levels are low. During quarry construction, noise will originate from the operation of heavy equipment, general construction activity, and roadway traffic. The long-term quarry operations that will generate noise include the removal of overburden, quarrying, limestone handling, barge loading, and tugboat traffic. Blasting will not be required in the quarrying operations. Ideal Basic Industries will utilize equipment with noise suppression systems that comply with the Walsh-Healy Act and the requirements of the Occupational Safety and Health Administration (OSHA) and the Mining Enforcement and Safety Administration (MESA). There are no additional mitigating measures or practical alternatives that would reduce noise generation at the quarry site.

Noise levels during construction and operation of the quarry have been modeled mathematically for assessment purposes. In the construction phase, the sphere of noise influence (defined here as the area in which the EPA-recommended noise levels for residential land use will be exceeded) will extend roughly 1 kilometer (0.6 mile) from the principal construction area near the Alabama River. The only land in this zone which is not part of the quarry project site is an uninhabited floodplain area directly across the river. During the operation phase, the sphere of noise at any given time will be approximately as large as during construction, but will migrate along with quarry operations rather than remaining centered near the river. This migrating zone of noise influence will not include any existing residences during the first 15 years of quarry operation, however. Due to the lack of receptors, the noise impacts of both construction and operation are considered low in magnitude and significance.

SOLID WASTE

The Monroe County landfill is located near Monroeville and utilizes a multi-lift system of disposal. The existing 10-hectare (25-acre) site has only 2 to 3 years of capacity remaining, but the county intends to expand into the surrounding rural property. Ideal Basic Industries will utilize the Monroe County landfill for disposal of construction debris such as lumber scraps and paper waste, and also for disposal of approximately 2.5 metric tons (2.7 tons) of paper and lunchroom waste and 1.7 metric tons (1.8 tons) of waste from the equipment maintenance shop during each year of quarry operation. No undesirable effects are expected other than a slight depletion of landfill capacity. The impacts of landfilling thus are rated low in magnitude and significance.

Vegetative waste from land clearing will be burned and chipped for mulch. The only negative impacts will be the air pollutant emissions from burning. All of the earth removed during construction will be utilized for earthworks construction, limestone supply, and land reclamation. Sediment removed from the stormwater clarification basins will also be used for reclamation.

The only viable project alternative relating to solid waste (other than on-site burial of vegetative waste) would be for Ideal Basic Industries to maintain an on-site landfill during the operation phase. This alternative is feasible but impractical because of the small amount of waste to be disposed each year.

WATER RESOURCES/GEOTECHNICAL

At the Ideal Basic Industries quarry site, the Alabama River drains approximately 57,000 square kilometers (22,000 square miles) and has an annual average discharge of 921 cubic meters per second (32,540 cubic feet per second). The flow regime of the river is marked by extreme variability, with water surface elevations at the quarry site varying as much as 10 meters (33 feet) in a single year. The U.S. Army Corps of Engineers maintains the river as a navigable waterway with a design depth of 2.7 meters (9 feet), but actual depths may approach 2.1 meters (7 feet) during extreme low water. Present freight traffic in the vicinity of the quarry site is light, averaging roughly one barge tow and 2.5 other vessels per day traveling in either direction.

The drainage areas and other characteristics of the four principal creeks crossing the Ideal Basic Industries quarry site are summarized in Table III-3. All quarrying activity in the first 15 years of the project will be conducted in the Thompson Mill and Hollinger watersheds. The streambed of Thompson Mill Creek has a relatively steep gradient, a gravel substrate, and very steep banks. Hollinger Creek has a somewhat lower gradient, more fine-grained bed material, a lower base flow, and a wider floodplain near the Alabama River. In addition to the creeks listed in Table III-3, the quarry site has four intermittent streams discharging to the Alabama River with drainage areas of 17 to 42 hectares (42 to 104 acres).

Table III-3. Streams Crossing the Quarry Site

Creek	Drainage Area (Hectares) Total	Drainage Area (Hectares) In Quarry Site	Flow	Predominant Land Use
McGirts Creek	161	30	Intermittent	Woodland
Thompson Mill Creek	1,777	385	Perennial	Woodland, pasture
Hollinger Creek	874	592	Nearly Perennial	Pasture
Randons Creek	14,324	506	Perennial	Agriculture, urban

Source: Environmental Science and Engineering, Inc., 1977.

Existing water quality in the Alabama River and the three largest tributary watersheds has been studied as part of the present assessment. The Alabama River appears to lack serious water quality problems other than periodically high levels of suspended solids and turbidity (linked to seasonality, rainfall, and the agricultural cycle). Water quality in Thompson Mill and Hollinger creeks is influenced by contact with limestone, but both streams lack significant dry-weather sources of organic pollution, and water quality in Thompson Mill Creek reflects relatively little human influence. Higher levels of water temperature and Kjeldahl nitrogen occur in Hollinger Creek because of the conversion of watershed land to improved pasture. In the future, water quality can be expected to deteriorate somewhat in both streams due to the on-going land clearance and intensification of agricultural use. Increases in sediment, nutrients, organic material, and water temperature can be expected, particularly in Thompson Mill Creek, with or without the Ideal Basic Industries quarry project.

The aspects of the quarry project which could affect water quality are the following: (1) construction of a free-standing mooring structure in the Alabama River; (2) on-site disposal of sewage; (3) storage of petroleum fuels; and (4) creation of land erosion potential due to construction, quarrying, stockpiling, and land reclamation activity. The first three of these activities are expected to involve negligible impacts on the environment. Dredging of the river bottom will not be required in order to construct the mooring structure, and pile driving should have little effect on water quality. Favorable soil conditions and low waste volumes should prevent any negative consequences from sewage disposal. Oil spills will be extremely unlikely because of the use of below-ground storage.

The principal safeguard against pollution of surface waters by eroded sediment will be the establishment of permanent stormwater clarification basins early in the construction phase of the quarry project. The basins will receive the surface runoff from all land areas disturbed by the quarry project and will have storage capacities exceeding the runoff volume associated with a 10-year, 24-hour storm event. A settleability study performed on the natural soils and limestones found at the quarry site has indicated that the suspended solids concentration of basin effluent will be less than the Alabama Water Improvement Commission standard of 30 milligrams per liter.

The additional erosion controls employed at the site will include: (1) revegetation with chipped mulch and native species of grasses, as both a temporary and permanent stabilization practice; (2) use of contour terracing to reduce velocities of flow across unvegetated surfaces; and (3) ditches and berms to divert runoff away from disturbed areas. A 30-meter (100-foot) setback of earth-moving activity from streambeds will be maintained for the major creeks on the site. Erosion potential due to handling of overburden will be minimized by grading and seeding all materials stockpiled for long periods, and by placing overburden in previously quarried areas as a "haulback" operation wherever possible. Finally, erosion will be limited by reclamation practices that simulate natural soil conditions (i.e., layering and compaction of subsoil, replacement of topsoil, and fertilization) which aid the establishment of vegetation.

As a result of these protective measures, the water resource impacts of land erosion and sediment transport should be low in both magnitude and significance, during both the construction and operation phases of the quarry project. The only additional mitigative measures available would involve further use of erosion controls such as mulching, seeding, netting, hay bales, sodding, and localized ponding. The major project alternatives would be the use of vegetation buffers or quarry pits to reduce the solids loading in storm runoff. Vegetated buffer strips would not be as efficient as clarification basins, and the use of quarry pits for runoff storage would not be possible during the first 5 to 7 years of the project.

The quarry project will have some permanent effects on groundwater flows and surface drainage patterns. Presently there is a surficial aquifer system involving the sand/clay soil layers and permeable limestone formations. This aquifer is actively discharging into the various creeks and the Alabama River. During the project life, the surficial aquifer will be disturbed in the immediate vicinity of active quarrying operations, with drawdown in the groundwater level extending perhaps 60 meters (200 feet) from each quarry face. The function of the surficial aquifer will be reinstated during land reclamation, however, and the moderately reduced relief may actually lead to increases in infiltration, groundwater flows, and base flow of local streams. The 14 wells identified in the vicinity of the quarry site will not be affected by any stage of the project, since these wells draw water either from upland surficial sands or from a deep aquifer that is isolated from the limestone strata by the impermeable Yazoo clay.

Major changes in the direction of groundwater flow are not expected, since the flow patterns should continue to be controlled by the contours of the Yazoo clay layer. However, the project will alter the pattern of surface drainage in some areas, because of quarrying requirements and the need to capture all runoff in clarification basins. There will be a net diversion of drainage from Thompson Mill Creek to the Alabama River, but the land area involved will amount to less than 10 percent of the present Thompson Mill Creek watershed. These effects upon surface and subsurface drainage are rated low in magnitude and significance as environmental impacts.

ARCHAEOLOGY

A walk-over surface survey of the quarry site conducted by the University of South Alabama identified eight archaeological sites and seven historic sites. Two sites were determined to be of special archaeological-historical interest. Only one of these, site 1Mn57, will be disturbed by quarrying operations. Test excavations at site 1Mn57 by the University of South Alabama Archaeological Lab revealed multiple components: a historic house site, a Mississippian component, a Woodland component, and an archaic component. The historic component yielded numerous artifacts of late 19th to early 20th century origin, many related to farming activity. The three prehistoric components were demonstrated by projectile points, blade tools, pottery, and pottery fragments. The archaeologist's final report was submitted to the Alabama Historical Commission in March, 1978, with a complete account of the required test excavations. Site 1Mn57 did not reveal significant archaeological evidence to mandate further investigation (see letter from State Historical Preservation Officer in Appendix F).

TERRESTRIAL ECOLOGY

Five major vegetational communities currently exist on the proposed quarry site: improved pasture and cropland, remnant forest, floodplain, pine-oak forest, and hardwood bottomland. The first vegetational category includes bahia-grass grazing land and fields planted to row crops and silage, bordered by weedy plant species that may be important to wildlife. Remnant forests are defined as disturbed woodland areas surrounded by improved pasture and used by livestock. These areas are characterized by elevated nutrient loadings, high insolation, compacted soils, and reduced understory due to grazing. The Alabama River floodplain, defined by the presence of alluvial soils, is a relatively small portion of the quarry site extending along the river bank and into the creek valleys. The floodplain vegetation is dominated by silver maple, gum, hickories, and ash, and also includes cypress, reed, red maple, titi, and cliftonia.

Most of the proposed quarry site is essentially upland pine-oak forests with bottomlands containing hardwood forests. The upland (mesic to xeric) pine-hardwood forest typically has a loblolly pine overstory which suppresses the development of a hardwood forest. However, many areas have been opened in the canopy as the result of past and present agricultural and forestry practices. These activities have yielded various stages of succession from old field to predominantly hardwood areas. The upland forests are composed of cedar, water oak, and pine with assorted hardwoods. Along the river bluffs there are microclimates characterized by relatively cool air, high humidity, and low illumination. These areas support luxuriant growths of ferns.

Many of the animals inhabiting forested areas of the proposed quarry site are the same as those found in the forested areas of the plant site, but there are exceptions in terms of abundance and diversity. The forests of the quarry site support a greater abundance of squirrels and are characterized by the presence of deer and wild turkey. The hardwood bottomlands and floodplain forest of the quarry site contain barred owls, hooded warblers, southeastern shrews, cottonmouths, southern dusky salamanders, and pickerel frogs, none of which are present at the plant site. Extensive and active beaver dams have been found in the lower reaches of Hollinger Creek. The characteristic exclusives of the forested area are warblers, chickadees, woodpeckers, squirrels, tree frogs, and skinks. The ubiquitous types are similar to those found at the plant site, e.g., raccoons, shrews, rabbits, and box turtles.

The pasture and cultivated fields of the quarry site are characterized by cattle, songbirds, cattle egrets, cotton rats, and mice. Deer, foxes, quail, mourning dove, and turkey also frequent these open areas. At the interface of the forest and pasture, an edge community provides cover, food, and nesting for a large variety of species. Seasonal patterns at the proposed quarry site include spring and fall increases of migratory species of birds and spring and summer increases in all resident populations.

In the past, the quarry site area has been cultivated, grazed, lumbered, and some portions have been burned. Surrounding areas have previously been cultivated for food crops. During the last 16 years, the property has been managed under an agreement with the U.S. Department of Agriculture. From 1968 to 1974, about 40 percent of the Ideal and McWilliams properties were managed by cutting 1,300 pine trees per year and thinning uplands to favor pine. The rates of timber harvesting and land clearance have recently increased with the conversion of large areas to improved pasture. A decline in overall animal diversity is probably occurring with the reduction of forest, edge, and shrub communities. The ecosystem now generally resembles a condition of very early forest succession. Such a condition is not new; it has happened several times in the last 200 years with cultivation, abandonment, and recultivation.

In addition to the value of the quarry site for timber and livestock production, the area has a high productivity for small game species such as bobwhite quail, mourning dove, snipe, and cottontail rabbit. There is a harvestable population of deer, and some trappable populations of fur-bearing mammals can be expected. Turkey and squirrel populations are present but declining because of the loss of hardwood forests. In terms of recreational and aesthetic value, the site is not unique but has a number of important natural features, including the riverfront bluffs and the scenic lower reaches of Thompson Mill, Hollinger, and Randons creeks.

Sixteen species of plants and animals which are endangered, threatened, or of special concern in Alabama have ranges that include the proposed quarry site. The only plant on this list is a pogonia (Isotria spectabilis) which has been observed growing on the hardwood slopes of the site. Three "endangered" animal species are the golden eagle, bald eagle, and Red Hills salamander. The bald eagle is considered likely to occur along the Alabama River at the quarry site, although no nests have been found. Golden eagles may occur occasionally at the Ideal property. Field reconnaissance has revealed no Red Hills salamanders nor their characteristic burrows, so that their likelihood of occurrence is considered marginal.

Two "threatened" species are the American alligator and the gopher tortoise. A few alligators are sighted each year near the confluence of Randons Creek and Lovetts Creek. The gopher tortoise is a burrowing animal that apparently was present at the quarry site in the past. Recent disturbances of the land have lowered its likelihood of occurrence. Three species of "special concern" that have been positively identified at the quarry site are the wood stork, red-shouldered hawk, and little blue heron.

During both the construction and operation phases of the quarry project, terrestrial ecosystems at the site will be affected by the loss of existing vegetation, the noise and dust effects of quarry activities, the existence of disturbed areas, and the land reclamation process. Although most of the site may eventually be quarried, the total area that is disturbed at any one time should not exceed 120 hectares (300 acres), excluding stable reclaimed land. The project plans call for all land to be reclaimed to improved pasture, which will be the condition initially encountered by quarrying in most cases.

In addition to the loss of vegetation associated with the quarry project, there may be disturbance to the wooded areas that remain. For example, the lower floodplain forest may be subject to increased surface runoff, insolation, and airflow, leading to changes in the composition and production of these remnant areas. The magnitude and significance of vegetation impacts are considered low, however, because there are abundant forested areas nearby, and because the quarry project will not affect the ultimate land use (pasture).

The quarry project will involve losses of rabbit, quail, turkey, and squirrel habitat, and generally will tend to change wildlife populations from forest types to old field/pasture types. The magnitude and significance of these changes are considered low because of the relatively small amount of affected land in comparison to the areawide abundance of available forest habitat. The loss of potential habitat for special-status species is also rated low because few of these species have actually been observed at the site and because the site possesses no unique habitat characteristics.

There are no mitigating measures available to reduce the immediate ecological impacts of land clearance, given the necessary characteristics of quarry operation. However, a revegetation program could be established to develop healthy biologic communities as a wildlife asset, particularly at the edge of mined areas. These "blend" zones would become ecotones between biotic communities and would be managed to produce more varied assemblages of plants and animals than would be possible for either community alone. The major project alternatives available involve land reclamation. Instead of reclaiming to pasture, the project could include the creation of a commercial pine forest or an old field condition leading by natural succession to a mixed deciduous woodland. These alternatives would lead to a different mix of faunal species and possibly greater ecosystem diversity than the pasture alternative.

The air and noise effects of quarrying could have some influence on terrestrial ecosystems. Fugitive dust may reduce the productivity of the remaining forest species at the periphery of the quarry. Noise may affect some species of wildlife, such as the turkey, which require a high degree of isolation. These impacts are low in magnitude and significance because of the frequent occurrence of the species involved and the relatively small area affected at any given time.

AQUATIC ECOLOGY

The lower Alabama river system is populated by larger, current-loving fish species in the main channel, numerous small fishes along the banks and in sheltered locations, and a great number of small stream or brook forms in the tributary streams. At the Ideal quarry site, Hollinger and Thompsom Mill creeks usually have insufficient water to maintain large riverine species, and the young of larger river fishes, such as carp, carp-suckers, catfish, buffalo, sturgeon, or drum, have not been observed. Fishes actually observed or seined from these creeks consist of minnows, sunfish, bass, and darters, with minnows and sunfish especially abundant. No special status fishes have been observed at the quarry site.

Dredging in the Alabama River near the future quarry docking area has failed to produce identifiable benthic macroinvertebrates, due to the lack of suitable habitat. No beds of mussel shoals were found in the vicinity. The macroinvertebrates identified in the tributary streams represent forms common to gravel, sand, riffle/pool streams found throughout the midwest and southeastern United States.

The ongoing conversion of land in these watersheds to improved pasture is affecting water quality and aquatic ecosystems significantly. Increases in sediment loadings, stream temperature, and storm runoff volume are occurring at the site, with Hollinger Creek preceding Thompson Mill Creek in terms of these changes. Without the Ideal quarry project, sediment loadings might decline after 1980 as the pastureland reaches stable condition. However, nutrient loadings would continue to increase due to higher stock-loading rates. Cattle would have access to the streams and would disturb the stream bottoms and add organic material and nutrients to the stream water.

Elevated sediment loadings in the stream water can reduce primary productivity and smother bottom-dwelling organisms. The overall effect of sedimentation, organic loadings, and land clearance is to increase the prevalence of facultative aquatic organisms. Siltation can be expected to create more soft-bottomed habitats which favor burrowing forms (worms, chironomids, burrowing mayflies) over root, rubble, sand, or gravel inhabitants. The removal of trees and their detrital components may eliminate the larger grazers and carnivores.

The principal influence of the quarry project on aquatic ecosystems will be to maintain the sediment loadings in the tributary streams at somewhat elevated levels. The magnitude and significance of this impact are considered low for the following three reasons. First, the sediment loadings due to quarry construction and operation will be limited by the use of clarification basins and other controls as discussed previously. Second, the net sedimentation effects of the quarry project alone would probably not be sufficient to cause pronounced changes in ecological conditions. Third, the ecological adjustments to elevated turbidity levels should have already occurred during the conversion of the site to improved pasture. The effects of sediment from the quarry project on the Alabama River are considered a negligible impact, in part because the suspended solids concentration of discharge from the clarification basins will be below that of the Alabama River during much of the year.

The anticipated long-term changes in topography and drainage are not expected to be important to aquatic ecosystems in the tributary streams. The diversion of surface drainage from the Thompson Mill Creek watershed will reduce storm flows slightly in that stream, but base flow should be unaffected since groundwater flow patterns will not be substantially altered. In the Alabama River, the increased barge traffic from the quarry could disturb activity patterns of water-associated birds, such as eagles and waterfowl, and could affect alligators in the area. Given the ability of all the affected species to relocate or adapt, these impacts are considered low in magnitude and significance.

SOCIOECONOMICS

Monroe County and the surrounding region historically have been characterized by declining populations and stagnant economic conditions. However, since 1970 there have been moderate population increases due to substantial economic growth. The principal economic support consists of manufacturing employment in wood products, textile products, and pulp and paper products. An important new development in Monroe County is the $266 million Parsons and Whittemore pulp mill, which is presently under construction.

Most public facilities in Monroe County, such as schools, hospitals, and water and sewer systems, are currently being expanded and should be adequate to serve future needs. The highway system is adequate, but public transportation and recreation facilities are deficient. Monroe County is a low-crime area, and lacks conspicuous social problems other than relatively low income levels. There is currently a moderate housing shortage due to recent economic development.

The Ideal Basic Industries quarry project will employ an average of 133 workers during the construction phase (18 months), with a peak construction employment of 250 persons. Permanent operations will employ

19 persons. No adverse social impacts are expected during the construction phase, based on the experience of the much larger Parsons and Whittemore construction project (which will be phasing out when the labor force build-up occurs at the quarry project). Permanent operations at the quarry will represent a significant economic benefit to Monroe County.

Increased barge traffic resulting from quarry operation will not adversely impact the existing use of the Alabama River. The isolation of the quarry site relative to other developed land uses makes it unlikely that the project will have adverse effects upon land use, land value, or residential amenity in the area.

CHAPTER IV
TRANSCRIPT OF THE PUBLIC HEARING

WRITTEN COMMENTS SUBMITTED

RESPONSES TO SUBSTANTIVE COMMENTS

UNITED STATES OF AMERICA

ENVIRONMENTAL PROTECTION AGENCY

REGION IV

- - - - - - - - - - - - - - - - -x
:
In the Matter of: :
:
JOINT PUBLIC HEARING :
:
- - - - - - - - - - - - - - - - -x

The transcript of the public hearing to receive comments on the Draft Environmental Impact Statement (EIS), the proposed issuance of a National Pollutant Discharge Elimination System (NPDES) permit and PSD approval to construct for Ideal Basic Industries, Inc., Cement Division, Denver, Colorado, heard in the Mobile City Auditorium, Mobile, Alabama, commencing at approximately 7:00 o'clock p.m., Monday, June 26, 1978.

-o0o-

CONTENTS

Opening Statement - Howard Zeller 3

EIS Process - Russell Todd 6

NPDES Permit - T. Michael Taimi 10

PSD Approval - Eliot Cooper 14

Alabama Water Improvement Commission - Charles Horn 16

Other Federal and State Agency Presentations and Local Elected Representatives 17

Statement by Ideal Basic Industries 25

Public Comments 33

Closing Statement - Howard Zeller 90

-o0o-

ATLANTA REPORTING COMPANY, INC.

PROCEEDINGS

MR. ZELLER: Could I ask you to take your seats, please?

Good evening, ladies and gentlemen. Welcome to the public hearing. My name is Howard Zeller, and I'm the Deputy Director of the Enforcement Division of the United States Environmental Protection Agency. Our headquarters are in Atlanta, Georgia.

The Region Administrator of Region IV, Mr. John White, has designated me to conduct the hearing here tonight. Appearing with me on the hearing panel is Mr. Charles Horn of the Alabama Water Improvement Commission. He is the one on my right (indicating). On my left is Mr. Bob Howard. Mr. Howard is with the Environmental Protection Agency with Environmental Impact Statement Branch.

Now, the National Environmental Policy Act of 1969 requires an agency of the federal government to prepare an environmental impact statement if the agency proposes to take federal action significantly affecting the quality of the human environment.

Tonight's hearing is concerned with possible actions by this agency with respect to the construction of a cement plant at the Theodore Industrial Park and the opening of a limestone quarry in Monroe County near Monroeville, Alabama. This project has been proposed by Ideal Basic Industries.

Incorporated, Cement Division, Denver, Colorado. Ideal Basic Industries has applied for a national improvement discharge and elimination system permit for each of these facilities. Issuance of the permit for the cement plant or limestone quarry is a federal action and requires compliance with the provisions of the National Environmental Policy Act of 1969 and the Clean Water Act of 1977.

Accordingly, Environmental Protection Agency has commissioned the preparation of Environmental Impact Statement for this facility. The draft of this statement has been prepared, and notice of its availability was published in the Federal Register, Volume 43, Number 98, page 21,729. It was published on May 19, 1978.

This hearing tonight is for the purpose of receiving comments on the draft environmental impact statement and the proposed issuance of national pollutants discharge elimination system permit. Although no decision has yet been made, the Environmental Protection Agency tentatively proposes to issue the NPDES permit.

The proposed permit contains limitations on the amount of pollutants allowed to be discharged in waters of the United States and were drafted in accordance with provisions of the Clean Water Act of 1977, which is 92,217, and local standards and regulations.

The explicit goal of the Federal Water Pollution

Control Act is to eliminate discharge of pollutants by 1985. To achieve this goal, the Environmental Protection Agency or the states would issue permits in waste water discharge setting limits and controls on the discharge of pollutants. Now, the act requires that a strict limit be imposed for new sources such as Ideal Basic Industries Cement Plant and limestone quarry.

Once the permit is issued, the discharge is legally bound to meet these requirements, and any violation may subject the permittee to criminal and civil penalties. Mr. Michael Taimi of Region IV EPA will discuss the NPDES permit of these facilities later this evening. The pollutant limitation and other conditions of the draft's permit are tentative and open to comments from the public at this hearing.

All comments presented here tonight or submitted in writing within the next two weeks will become a part of the administrative record. The information in the record will be used to determine the environmental compatibility of permit issuance. These permits will be included in the final environmental impact statement.

In addition, you should be aware that all substantive comments on the proposed project in the draft of the environmental impact statement or received here tonight and transcribed for the record or submitted in writing directly to EPA will be summarized and addressed in the final

ATLANTA REPORTING COMPANY, INC.

environmental impact statement.

Dr. Russell Todd of the Environmental Impact Statement Branch is project officer, and he will at this time give you a very brief description of the project.

Dr. Todd, if you would come up at this time?

DR. TODD: Good evening, ladies and gentlemen. I am Russell Todd, EPA Project Officer for the Environmental Impact Statement on the proposed Ideal Basic Industries Cement Plant and Limestone Quarry.

The National Environmental Policy Act requires that the responsible federal official prepare a statement of environmental impact known as the EIS for all major federal actions significantly affecting the quality of the human environment.

The purpose of the EIS is to provide government agencies and the public with information to insure appropriate environmental impacts are considered in the decision-making process on federal actions.

EPA's authority to prepare an EIS is stated in Section 511, Part C, of the Federal Water Pollution Control Act as amended, 1972.

Two actions by EPA are defined as major federal actions. One of these is the issuance of a new source water discharge permit. For these actions, the responsible official, in this case the Regional Administrator, must

ATLANTA REPORTING COMPANY, INC.

determine if the potential for significant impacts exist. If so, then EIS must be prepared.

In the case of Ideal Basic Industries, cement plant and limestone quarry, the issuance of the new source NPDES permit has been determined to significantly affect the quality of the human environment.

Ideal Basic Industries has also applied for a construction permit from the Corps of Engineers to construct dock facilities at the plant site and quarry site after they construct a causeway and bridge for an access road to construct a railroad trestle across the north fork of Deer River to the plant site. This is also a federal action subject to the National Environmental Policy Act.

EPA has accepted the role of lead agency for preparation of EIS and requested comments and input from the Mobile District Corps of Engineers' office throughout the development of EIS.

The EIS preparation process utilized what we call the third-party concept, Ideal Basic Industries, Cement Division, nominated Environmental Science and Engineering, Incorporated, to be the environmental consultant. EPA reviewed and subsequently approved this firm on their objectivity and qualifications.

Environmental Science and Engineering, Incorporated, was retained by Ideal Basic Industries. However, EPA directed the consultant in the preparation of the EIS. EPA retains responsibility for the content of the EIS.

Briefly, I would like to explain the format of the EIS. The magnitude of the proposed project required a detailed assessment of many potential areas of impact. The preliminary draft was too bulky and complex for general distribution. Therefore, the draft EIS was developed by summarizing the four volume reporting reports. This procedure is consistent with recent Council on Environmental Quality directives to reduce paperwork and make EIS more readable.

The draft EIS presents a general discussion of the background for the construction of the proposed cement plant and the supporting limestone quarry. Environment is described as it is today and how it would be with and without the proposed project.

Alternatives are discussed for air emission control, discharge of runoff from rainfall, possible plant site locations, possible quarry sites, sources of raw materials, cement manufacturing processes, arrangement of facility layout, and reclamation of quarried areas. Because of the existing water quality in the Theodore Barge Canal and the fact that portions of Mobile County have been declared to be in a non-attainment area for particulates in air, the draft EIS emphasizes the impacts of discharges to the canal and of air emissions from the proposed project.

ATLANTA REPORTING COMPANY, INC.

The draft EIS contains a section on mitigative measures. Our efforts in this regard are not completed until we have your comment. Your suggestions in this matter will be given careful consideration. It should be understood that this draft impact statement represents EPA's assessment of the project and proposed action.

The decision has not been made regarding permit issuance. That decision will be printed in the final EIS. Your comments on this decision would likewise be given careful consideration.

Please be specific in your comments to the extent possible. Any comments you may have on improvements to the format or content of the EIS would also be appreciated. EPA desires to make the EIS process responsive to the public. The draft EIS was made available to the public on May 19, 1978.

The comment appearing on this draft EIS was essentially close July 3, 1978, until July 10, 1978, for the draft NPDES permit. Comments received by these dates will be considered as if they had been presented here tonight. Mailing address for comments is on the bottom of your agenda. Scheduling is difficult, but I anticipate having the final impact statement available by late summer. Material contained in the draft impact statement will not be published again in the final. It will be included by reference only. The final

EIS will consist of the Agency's statement of findings. The decision on the water discharge permit, any pertinent information or evaluations developed since publication of the draft, substantive comments, and agency responses, and the transcript of this hearing. For those persons who have not received a copy of the draft EIS, a limited number will be available at the registration desk.

Thank you for your attendence here tonight.

MR. ZELLER: Thank you, Dr. Todd.

I would like to move on down the agenda now and ask Mr. Michael Taimi if he would come before you and give us some details in regard to NPDES permits.

Mr. Taimi?

MR. TAIMI: Thank you.

My name is Michael Taimi. I am employed as a sanitary engineer with the Water Enforcement Branch of the Environmental Protection Agency, Atlanta, Georgia.

On February 17, 1978, our regional office in Atlanta received National Pollutants Discharge Elimination System, also known as NPDES, permit applications from Ideal Basic Cement, Basic Industries, of Denver, Colorado, for two proposed facilities to be located in Alabama. One was proposed to locate in the Theodore Industrial Park, and two, a proposed limestone quarry located in Monroe County. Both of these facilities had previously been declared new sources requiring the issuance of new source NPDES permits. Section 306 of the Clean Water Act requires that any NPDES permit issued to a new source must contain effluent limitations consistent with the applicable new source performance standards.

A new source performance standard provides for the control of pollutants which reflects the greatest degree of affluent reduction to be achievable through the application of best demonstrated controlled technology processes, operating methods, and other alternatives.

In addition, the new source permit must reflect a level of pollutant discharge which will protect the designated water quality standards that are receiving waterways.

In our review of the application for the cement plant, which has been assigned application number A00028801, it was noted that the company contemplated two discharges. One discharge, number 001, was to consist of materials stockpile runoffs, cooling tower blowdown, vehicle, and four washwaters, and fuel storage area dike drainage.

This discharge was to the Theodore Ship Canal, a waterway, classified by the State of Alabama as suitable for fish and wildlife.

The other discharge, known as 002, was to consist of non-contaminated storm water runoff entering the north

ATLANTA REPORTING COMPANY, INC.

fork of the Deer River, which is also classified as suitable for fish and wildlife. As many of you may know, EPA is on public statement, public record stating it would not permit any discharges to Theodore Ship Canal that would not be consistent with the applicable water quality standard. Since existing water quality in the canal has been found to be less than that required by the Fish and Wildlife standard, the only discharges which could be permitted would be those of the quality equal to or better than that of the Fish and Wildlife standard.

To demonstrate that Ideal's number 001 discharge would be of such a quality and not produce toxic effects to fish, the company proceded to perform toxicity studies on their anticipated worse-case discharge using immature bluegill sunfish. These studies using 100 percent effluent resulted in no fish dying at the end of the test period. Inferred from these test results that the proposed discharge to the Theodore Ship Canal was non-toxic.

The results of these tests have been reviewed by our Ecology Branch located in Athens, Georgia, and have been acceptable due to the non-toxic nature of the proposed discharge in the Theodore Ship Canal. EPA made a tentative determination to authorize discharge consistent with applicable new source performance standards. This would place stringent controls on the amount of suspended solids to be discharged as well as the range of the pH.

In addition, internal controls were placed on the drainage from the fuel storage areas, the discharge from Serial Number 002 being of uncontaminated storm water runoffs will be authorized subject to the use of best management practices for the control of runoff.

The application for the proposed limestone quarry, assigned application number AL0028819, indicated five anticipated discharges all associated with active mining. The proposed discharges included pit pumpage of ground water seepage in precipitation of surface runoff that enters the active mining area.

The discharges in the quarry will all enter the Alabama River, which has been classified as suitable for fish and wildlife. The draft permit for the quarry is written according to new source performance standards and includes stringent controls on pH and suspended solvents.

In addition to the controls placed on the discharges, the draft permits also contain specific monitoring and reporting requirements. It's believed that these requirements are of sufficient frequency to insure compliance with the permit conditions.

In conclusion, both new source NPDES permits have been drafted to mean all requirements of the Clean Water Act -- and are being so drafted -- are more than adequate to insure that all intended uses of the preceding waters will continue indefinitely.

Thank you.

MR. ZELLER: Thank you, Mr. Taimi.

Next, I would like to ask Mr. Eliot Cooper of the Environmental Protection Agency, Air Programs Branch, to come forward. Mr. Cooper will address the problem of air quality and, specifically, those regulations in the Environmental Protection Agency that deal with protection of air quality or the prevention of significant deterioration of air quality.

Mr. Cooper?

MR. COOPER: Thank you.

United States Environmental Protection Agency, as mandated by the Clean Air Act Amendments, 1977, and code of federal regulations requires all new portland cement plants will emit sulfur dioxide or particulate matter to undergo the prevention of significant deterioration review.

Requirements that must be fulfilled prior to the construction of such facilities are the thirty day comment period must be announced. The applicant must demonstrate that allowable air quality increments standards and emission standards will not be violated. The best available control technology must be applied, and a prevention-of-significant-deterioration construction permit must be obtained.

The prevention of significant deterioration analysis was performed by the Environmental Protection Agency utilizing information prepared and submitted by Ideal Basic Industries' engineering consultant, Environmental Science and Engineering. The analysis showed that the requirements under the prevention of significant deterioration to be satisfied.

On March 30, 1978, the Environmental Protection Agency issued Ideal Basic Industries a permit to construct proposed cement plant.

At this time, I would like to point out that air quality considerations has a potential to be a limiting factor for growth in the Theodore Industrial Park area. Prevention of significant deterioration requirements must be carefully planned for considering growth is received consistent with air quality goals. What I am saying is that there are only finite air quality increments and air quality resources in this area to accomodate growth and industrial expansion.

Proposed Ideal Cement Plant will utilize portion of the increments. Air quality forecasts indicate that the proposed project will not place significant limitations upon future growth in the Theodore area. However, approval of further construction will be based on a case-by-case analysis, taking into account Ideal Cement's pollutant emissions meteorology of the area and the distance between these sources.

Thank you.

MR. ZELLER: Thank you, Mr. Cooper.

Next, I would like to continue on down and ask Mr. Charles Horn with Alabama Water Improvement Commission -- you may do so, Mr. Horn, if you'd like.

MR. HORN: Mr. Chairman, ladies and gentlemen, my name is Charles Horn. I am Chief, Industrial Waste Section, Alabama Water Improvement Commission, Technical Staff, and tonight I am representing Mr. James W. Ward, Director of the Commission staff.

The Water Improvement Commission appreciates the opportunity to participate in this hearing to consider the Environmental Impact Statement for Ideal Basic Industries. Comments received at this hearing will be considered relative to certification and eventual issuance of state, NPDES, and other permits.

The Commission staff has reviewed the EIS as it applies to both the Theodore plant site, the quarry site, and has provided written comments concerning technical details associated with each of these sites. At this time, the Commission staff does not have additional comments on the EIS, but I would like to reserve the opportunity to offer comments before the hearing record closes.

Further comments will also be provided on an NPDES permit within the allwoed public notice period. The Ideal

ATLANTA REPORTING COMPANY, INC.

Basic project proposed for Theodore has, in the opinion of the Commission staff, been well-planned and well-organized project, much effort going into coordinating the project for management plans for the Theodore Industrial Park, both environmental and otherwise.

Again, we appreciate the opportunity to participate in this hearing and look forward to receiving any constructive comments which might augment the review today.

Thank you.

MR. ZELLER: Thank you, Mr. Horn.

Let me ask at this time if there are any other state or federal agencies that might be in the audience who would like to make a statement at this time. If so, I would like for you to come forward.

Yes, sir? Would you come forward, please?

MR. MARTIN: My name is John W. Martin. I am employed with the Alabama Development Office, State of Alabama. I am here tonight to read the letter to be entered into the record by Governor Wallace. The letter is addressed to Mr. John C. White, Regional Administrator, Environmental Protection Agency, Region IV, 345 Courtland Street, Atlanta, Georgia.

Dear Mr. White:

For a number of years I have been actively involved in the several development agencies interested in developing the Theodore Industrial Area. During this period, the Alabama Development Office staff, along with the staffs of the Alabama Water Improvement Commission, the Alabama Air Pollution Control Commission and local agencies, have worked in close cooperation.

This cooperative effort has been necessary to assure that industries located in the Theodore Industrial Area will create economic growth without jeopardy to our environment.

We all want and expect a continuation of environmental quality, not only for today, but for the years to come. I have been periodically informed by my staff of the extensive effort, time, and money, that has been made by the management of Ideal Basic Industries to retain the good environmental quality which is now present in the Theodore Industrial area.

I am hopeful that the permitting process for this fine company can be finalized at the earliest possible date so that construction can commence, and the many construction

ATLANTA REPORTING COMPANY, INC.

workers required for this project can be employed.

Sincerely,
George C. Wallace
Governor of the
State of Alabama

MR. ZELLER: Thank you, very much, Mr. Martin. We appreciate receiving that information.

Is Mr. Sunny Callahan here? Mr. Callahan has a statement. Would you come forward, please, sir?

MR. CALLAHAN: Mr. Chairman and members of the Commission, fellow Alabamians, fellow Mobile Countians, I have been one of the many, Mr. Chairman -- and, incidentally, I am State Representative Sunny Callahan, the Chairman of the Mobile House Delegation -- I have been one of the many who worked towards the development of Theodore Industrial Park.

I have been primarily interested and active in the State's funding of the project, and especially in the Theodore Channel and the bridges, the development of the park itself, but, at the same time, I have been actively interested in assuring my constituency and my fellow Mobile Countians that every industry both within and without the park will meet the necessary environmental requirements that will protect our air and water.

Independently, I have made my own investigation into each new industry that has applied, and the same investigation has taken place with Ideal Basic Industries. It's a very simple investigation, Mr. Chairman, certainly not as sophisticated as yours, but it simply states or goes on to investigate two areas.

One is the past history of the company, and this and other areas. Have they applied, and have they met the necessary requirements in other areas of the United States in their endeavors;

And, two, simply, will they meet the necessary requirements here in Mobile County, and my simple investigation -- and I think that most of your report is going to lead you to believe, too, that this is true, that Ideal Basic Industries has in the other areas of the United States, met every, or met all of their requirements that I have been able to find in air, and water, and environment, in every way that they can, and they have personally assured me, Mr. Chairman, that they are going to meet these requirements here in Mobile, Alabama.

In my opinion, Ideal Basic Industries is the type of industry we need here in Mobile, Alabama. They have given me their personal assurance that they will. I'm sure that you will find that they are qualified or will qualify in every one of your requirements. In my opinion, this industry will be a tremendous asset to this community.

With that, Mr. Chairman, I would appreciate the granting of this permit, and I will use this podium to welcome this tremendous new asset to the County of Mobile.

Thank you.

MR. ZELLER: Thank you, Mr. Callahan. We appreciate your input at this hearing.

I would also like to announce at this time that your colleague, Mr. Bob Glass, who is also in the Alabama Legislature, is unable to be here, but he has sent a letter representing District 105 of the Alabama House of Representatives, and he submitted this statement (indicating) for the record supporting Ideal Basic Industries' permit application for the Theodore Industrial area.

Next, I would like to ask Mr. Mimms, Mr. Lambert Mimms, Mayor of Mobile -- are you hear, Mr. Mimms?

MAYOR MIMMS: Thank you, very much, Mr. Chairman.

I have a letter supporting Ideal Basic's project. I will not read the letter. I will give it to this gentleman and the ladies for the record.

However, I would like to read the last sentence of my letter. "Whereby, we urge EPA to award the necessary permits so that construction may begin at the earliest possible date."

Thank you very much.

MR. ZELLER: Thank you, Mr. Mayor.

(Applause)

MR. ZELLER: Next, I would like to ask Mr. James E. Warren, State Representative from Monroe County.

Mr. Warren?

MR. WARREN: Yes, Mr. Chairman. I am Mr. Warren. First of all, I would read a letter from my colleague in the House, the Speaker of the House. This plant in Monroe County will actually be in his part of Monroe. I represent Monroe, and he does, too, but this plant is in Joe McCorquodale's district.

He says,

> As Speaker of the Alabama House of Representatives and Representative of the district for the proposed limestone quarry will be operating, I want to express my full support of the project.
>
> The economic benefit from Clarke and Monroe County will be good for our people. We are a rural area, and our natural resources, such as limestone, must be developed to provide jobs.
>
> This area of our state and county is sparsely populated, and an industry of this type will not create a problem. With present-day technology and proper supervision, economic development in environmental projects can and must be compatible.
>
> Our population is evenly divided between

black and white races. These are proud people, and, given the opportunity for jobs, will work.

This is that opportunity, and I urge your favorable consideration.

J. C. McCorquodale, Jr.
Speaker of the Alabama
House of Representatives

Now, I have my letter, which is basically the same, and I will just read the last paragraph:

I respectively urge the approval of the construction and operation of this important and much-needed project.

One other state representative from Baldwin County, that hinges on the north end of his, John McMillan, Jr., and his is basically the same, and I'll leave these few letters over here.

I also think that Ideal is to be commended for the outstanding job they have done in planning these facilities in such a manner that our area might receive economic advantages their location offers without the unpleasant side-effects so often associated with industry.

Thank you very much.

MR. ZELLER: Thank you, sir.

Next, I would like to ask Mr. L. W. Newnan. Senator Newnan, are you here, sir?

MR. NEWNAN: Mr. Zeller, Mr. Horn, Mr. Howard, ladies and gentlemen, I would like to submit a statement, a very brief verbal statement.

About a month ago, I had the opportunity to receive the EIS draft. After I read this draft -- I don't profess any strong professionalism or expertise of statements -- nevertheless, I have read this statement, and, in my own judgment, I find it to be professional, well planned, honest, conscientious, and a good-faith effort to meet our environmental air and water quality laws of the State of Alabama as well as, I understand, the federal laws.

Based upon this reading, based upon this assessment, Mr. Chairman, I would like to submit that I do support the issuance of an NPDES permit to Ideal Basic.

Thank you very much.

MR. ZELLER: Thank you, Senator.

Finally, I have another statement I would like to read into the record. It is addressed to me here at the Municipal Auditorium. It is from United States Senator Maryon Allen.

Senator Allen says,

> I wish it were possible for me to be at the public hearing this evening to express my personal thoughts on the plan to construct a cement plant in Theodore Industrial Park.

Let me assure you of my interest and my support for the plant. Such a facility will be a significant addition to the industrial base of the entire area.

I know that my late husband, Senator Jim Allen would have applauded the joint cooperative efforts of the community, local officials, and the company in developing compliance for the project. I am following Jim's lead in favoring development by urging you and the Environmental Protection Agency to give favorable consideration to the project following the public hearings.

Signed by Maryon Allen.

Moving on with the agenda, we have an awful lot of ground to cover here tonight. I would like to ask if Ideal Basic Industries would like to make a statement at this time. If so, I don't know who the speaker will be.

MR. THOMMASON: Mr. Zeller, I would like to make a statement.

MR. ZELLER: Thank you, sir. If you come up here (indicating) and state your name, please.

MR. THOMMASON: Ladies and gentlemen, hearing panel members, I am John C. Thommason, assistant to the president of Ideal Basic Industries, Inc., project director for the company's proposed new cement plant in the Theodore Industrial Park in supporting the limestone quarry in Monroe County.

As Ideal's designated spokesman for these projects, I would like to read the following statement into the hearing record:

> In May of 1977, Ideal's board of directors approved construction of a 1,500,000 ton per year cement plant in the Theodore Industrial Park near Mobile and its limestone quarry operation adjacent to the Alabama River in Monroe County.
>
> This $175 million commitment followed nearly five years of extensive economic and engineering feasibility studies. Ideal has extensively studied numerous production schemes and manufacturing processes, raw material and fuel sources, transportation alternatives, environmental requirements, and other primary and secondary site location criteria.
>
> Twenty-seven potential cement plant sites were identified and studied at length in terms of their comparable advantages and disadvantages. The site of Theodore was ultimately chosen by the company as it provided the best combination of selected criteria.

Production from the new plant would serve an important and rapidly growing economic region, the Gulf Coast geographical area in which Ideal has been a major supplier for basic construction material considered essential to construction progress since the late 1940's, also looking where the company's internal supply capabilities as they come increasingly inadequate to meet available market demand.

Ideal's plant engineering design is based on the very latest cement manufacturing technology in the world. By utilizing the advanced manufacturing technology of European and Japanese cement producers, combined with sophisticated environmental controls and technical skills from the United States, the plant will be the first of its kind in the world.

While the project represents a large and technologically advanced undertaking for our company, all processing components will represent areas of technical expertise in Ideal.

The benefits of the manufacturing process selected by Ideal are numerous. By design, the process is energy efficient, affecting as much as a 40-percent savings over conventional wet-

ATLANTA REPORTING COMPANY, INC.

process cement manufacturing technology. Both sulfur oxides and nitrogen oxides are substantially reduced.

The particulate matter which in other less technologically environmentally advanced processes would escape through the plant's stacks is returned in the process to become a part of the finished product. This is the two-fold effect of better utilizing resources by reducing the amount of pollutants which need to be abated. It also means the plant will produce no processed related solid wastes typically associated in the past with the cement-manufacturing process.

High efficiency filtration units representing best available control technology will be employed on all air emission points and will comply with all local, state, and federal air emission standards.

Finally, the plant will utilize coal as a fuel source, which is in abundant supply and would, therefore, not deplete dwindling reserves of more restricted energy sources.

It is also important to point out that Ideal's project will not place significant limitations upon future industrial growth in the area. The manufacturing method selected by Ideal is a dry process not requiring any process water. The main water discharges associated with the plant will be the runoff as rainwater from area drainage and from stockpiled raw materials which have been determined by independent biological testing to contain no substances toxic to fish life.

Furthermore, water discharge from the immediate plant area will be directed to the inland portion of the Theodore ship channel and will be of better quality than water conditions now existing in the present Theodore Barge Canal.

Because of the quality of Ideal's water discharges, the project will not tie into the proposed Theodore outfall pipeline. Other treated storm water runoff from the site will be directed to north fork of Deer River and will increase the water supply to the adjacent marsh, thus likely enhancing the existing environmental quality of this area.

The company plans to preserve virtually all of the marsh in its natural state. As a consequence of Ideal's commitment to preserve the wetland areas which traverse the property from east to west, Ideal will develop less than 70 acres of its 175-acre Theodore site.

A 300-foot wide belt will be maintained along Dauphin Island Parkway to provide visual and noise protection. The undeveloped land north of the estuarial area will also act as a buffer.

Finally, a compatible landscaping program for the plant area is also an integral part of Ideal's development plans. Although not legally required, Ideal has accepted its environmental responsibility and will reclaim nine disturbed areas after the quarrying of the limestone. The reclaimed land will be returned to a primary use as pasture but with greater elevational and vegetative diversity than now exists.

The socio-economic impacts of the project will bring many benefits to Alabama, and to Mobile, and the Monroeville connumities. During the construction phase of these projects, it is projected that the Theodore labor force will average some 360 persons with a peak of 750 construction workers occurring midway through the 30-month anticipated construction period.

The construction payroll of $15 million will accrue to residents of south Alabama since approximately 85 percent of construction employees will be local hires. Another $10 million on materials and service purchases will also occur in the Mobile area during construction. Ideal's Theodore project during construction should generate about 1,370 person-years of employment and $30 million of added personal income.

Construction will have minimal adverse effects on housing, public facilities, and social services because of minimal labor importation. Once operational, the Theodore plant will employ some 135 persons with an estimated annual payroll of $3 million.

Annual purchases in Mobile and south Alabama are projected to exceed $10 million for support services and equipment. The indirect, or spinoff, benefits from operation are also very substantial, and EPA has calculated that total employment of Ideal's project in the Mobile SMSA area as being approximately 500 jobs. Over a 20-year period, the new cement plant is projected to generate roughly 5,500 person-years of employment.

Development of the quarry will employ an average of 133 construction workers with a peak labor force of about 250 persons occurring midway through an 18-month construction period. Total construction wages are projected to exceed $3 million.

EPA has estimated the multiplier impact of quarry construction employment as generating 60 additional jobs in Monroeville and surrounding counties in $1 million or more in additional personal income.

During operation, Ideal's Monroe County quarry will provide jobs for approximately 20 persons, generating an average annual payroll in excess of $400,000. Permanent operations at the quarry are ultimately expected to generate a total of 44 new jobs in Monroe County, including some 24 indirect jobs.

The isolation of Ideal's quarry site relative to other developed land uses will greatly limit the possibility of off-site impacts upon land use in value or residential amenity.

Quarry operation is not expected to have significant effects on air, water, or noise quality. Ideal's concern for the environment has been manifested at a number of public meetings in question and answer sessions with interest groups and individuals for several years. We appreciate the public input and cooperation generated by these groups' presence during the development of the project.

Even though this public hearing marks a high point of the environmental impact statement process, Ideal will continue its cooperative spirit by maintaining its open posture with the community.

Thank you, Mr. Chairman.

MR. ZELLER: Thank you.

Finally, I'd like to proceed now with the real reason we are gathered here tonight. That's with the public comment at this hearing, but before we do, I would like to make a few comments into the record with regard to the conduct of the hearing and how we will handle the comments from the public.

Certainly, it's expressed in both the federal water pollution Control Act and the National Environmental Policy Act to encourage them to provide for the public anticipation of input into the determinations that are required by these statutes. The draft environmental impact statements and the NPDES permits are being discussed in this public open forum so that we can have full participation of the public in the decision-making process so that we can develop a greater responsiveness of the government action to the public's concerns and priorities, and to develop improved public understanding of the Ideal Basic Industries Cement Division and the actions this agency has proposed with respect to this facility.

The hearing tonight is being conducted pursuant to 40CFR Section 12534 by regulation and will present you an opportunity to make your views with respect to the project known to the governmental agencies that are charged with the responsibility of making decisions concerning this plant. Notice of the public hearing was published in the Mobile Press May 26, 1978, and Monroe Journal on May 25, 1978. In addition, copies of the public notice were mailed to each of those individuals or organizations on the EPA mailing list as well as to all appropriate government agencies.

Right now I would like to make sure that everyone here has registered. If, for some reason, you have not registered at the desk, would you please do so before you leave. I want you to register so that we can have a record of those in attendence and also so that we can send you a notice of our determination regarding this hearing. Those of you who would like to be added to our mailing list should check the appropriate box on the card. If you have not registered, and you wish to make an oral statement, please register your intent right now.

Most of you have a copy of the agenda. It's also available at the registration desk along with public notice and a fact sheet.

Generally, this hearing will be conducted informally. There are no formal rules of evidence. Both written and oral statements will be accepted. Any and all persons desiring to make oral comments or to submit them as written comments will be afforded an opportunity to do so. If you have a written statement which will accompany your oral presentation, I would like to have a copy of that written statement prior to your beginning.

If you have a lengthy written statement, I ask that your oral presentation be in summary form if at all possible. Oral presentations should be limited to 10 minutes or less, and I may interrupt or cut short, if necessary, any oral presentation exceeding this limit.

At this time, we have 42 people who have indicated a desire to speak tonight. If everybody takes 10 minutes, we will be here a long time. I certainly want everyone to clearly understand you have as much time to put whatever you wish into the record, but let me ask you at this time to please make your presentations as brief as possible so that everyone will be given equal time and an equal opportunity to make a statement.

Members of the panel may ask questions of the persons presenting oral comments where it feels necessary to clarify the nature and substance and comment or any part thereof. If you will go along with the agenda, I would like to ask each person making a statement to step up to the microphone on the podium, state his or her name, and the interest or organization represented. This hearing is being recorded by a court reporter and also by our recording devices to provide a transcript for the record.

In addition to oral and written comments, the comment period on the draft environmental impact statement remains open for an additional two weeks to allow submission of further comments. We will hold the record of this hearing and any other comments received as a matter of public record at the regional office in Atlanta.

We stress again that the comments of this hearing will be informal. We may ask questions of participants. As a general rule, we will not respond to questions from this panel, although I want to stress that the reason for us being here tonight is for the purpose of information, and in the event there is a question that is begging to be answered, we will respond to that question and make it known for the individuals who are represented here tonight.

Let me urge you to contact the EPA technical staff that's represented here as well as the technical staff from the Alabama Water Improvement Commission in the event you have any specific questions about air or water quality. They are here to respond to you, and will be available after the meeting.

Finally, I'd like to move on now with the individuals here who have asked to comment for the record, and I have taken these people in order of their registration, and we will proceed generally along those lines.

The first person whom I will be asking to come forward at this time is Mr. Haas, the county commissioner for Mobile County.

Would you come forward, please, sir?

MR. HAAS: Thank you, Mr. Zeller. My name is Bert Haas. I am county commissioner. I am gland to have the opportunity to present these, this letter of support under the title of Public Comments. I was somewhat chagrined that the federal government no longer recognizes county officials as local elected representatives.

MR. ZELLER: Let me at this time apologize to you, Mr. Haas, for not recognizing and also to apologize for not pronouncing your name right. It was an oversight, and I apologize. You should have been recognized along with the other elected officials.

MR. HAAS: Thank you.

MR. ZELLER: Now that we have that straight!

(Laughter)

MR. HAAS: I won't take the time to read my statement from the Mobile County Commission, but I would simply like to say that we have had the opportunity to work with Ideal Basic Industries for quite some time, and we genuinely believe that there will be an outstanding corporate citizen in Mobile, and we look forward to their becoming a member of our community.

We urge the issuance of the necessary permits. Also, I have a similar letter of support from the City of Bayou La Batre that I would like to present in the record.

MR. ZELLER: Thank you. You may do so, Mr. Haas. Thank you very much, sir.

Next, I would like Mr. G. T. Nelson, vice-president of Alabama Power Company.

Mr. Nelson?

MR. NELSON: Ladies and gentlemen, I am G. G. Nelson, vice-president of Alabama Power and manager of its industrial development department. In this capacity I appear before you this evening.

For more than 50 years, Alabama Power has maintained an industrial development department whose principal duty is the creation of jobs for the citizens of Alabama. I wish to express my appreciation for the opportunity to present this statement concerning the proposed cement plant to be constructed by Ideal Basic as described in the draft EIS.

I have had the pleasure of working with the officials of Ideal Basic Industries for many years. The company has been very successful in providing a much-needed product to the public, and it's well managed by a very ethical management team.

ATLANTA REPORTING COMPANY, INC.

The cement plant and supplemental limestone quarry will make efficient use of Alabama's abundant natural resources, limestone clay, and sand. Conversion of these resources into a salable product will provide a valuable boost in the economy of the Mobile and Monroeville areas. The Theodore area has long been identified as an industrial complex and will continue to experience growth whether or not Ideal Basic Industries is permitted to construct this facility.

The question is really to identify the best possible industry to locate within this complex. The proposed Ideal Basic Industries Manufacturing Plant in Theodore would be the largest facility of its kind ever constructed in a single stage in the United States. The project is the outcome of a five-year planning process which included the considerations of 27 potential sites as candidate alternatives among other considerations.

A high premium was placed on the site with access to deep water. The proposed Theodore Ship Channel, which is to be built under the auspices of the Corps of Engineers, will provide a 40-foot deep water channel to the plant site. The cement plant will make the best use of this channel as a means of transportation of basic aggregates as well as finished products.

The two projects will ultimately represent a total construction cost of almost $200 million in 1977 dollars, including $20 million for air and water pollution control facilities. When in operation, the combined annual payrolls for direct and indirect personnel will be approximately $8 million in 1977 dollars.

We join with other people in urging that this project be given speedy approval.

Thank you.

MR. ZELLER: Thank you, sir.

I would like at this time to acknowledge two statements that we have received here. I will not read them into the record in their entirety, but Mr. James M. Hiers of the American National Bank and Trust Company has submitted a statement which will be for the record. His statement is in support of the permit application for Ideal Cement.

I also have a letter from the Mobile Bar Pilots' Association signed by Mr. Douglas J. McCall, who is president and asked that this statement be filed in support of the construction of the Ideal Basic Cement. It will be so done in its entirety for the record.

Next, I would like to ask Mr. Ken L. Lot, who is president of the Merchants National Bank.

Mr. Lot?

MR. LOT: Thank you, Mr. Chairman. My name is Ken Lot. I am president of the Merchants National Bank, which is a corporate citizen of Mobile County, one which is vitally interested in the economic quality of life in this county, and, also, the environmental quality.

Gentlemen, we have had the opportunity to review the environmental impact statement prepared under Ideal Basic Industries -- the proposed cement plant for the Theodore Industrial Park in Mobile County and the limestone quarry in Monroe County.

It is our considered opinion that Ideal Basic Industries has developed a plan for construction in operating the cement plant that meets every requirement and utilizes the best available technology in their process procedures to control impacts to the environment. Of particular note for the mitigating alternatives which impose inconvenience and extra cost in some cases to provide the best results as possible.

We have known this company and their management for many years, and we have the highest respect for their methods of operation, their integrity, and their civic responsibilities. We recommend that their permit request be granted.

Thank you.

MR. ZELLER: Thank you, sir.

Next, I would like Mr. William H. Holland, who is vice-president of Wilson Electric Company.

Mr. Holland?

MR. HOLLAND: Mr. Chairman, I am William H. Holland, vice-president of Wilson Electric Company, Incorporated, and immediate past president of the Mobile Area Chamber of Commerce. I reside on Fowl River. My living address is Route 1, Box 2778, Theodore, Alabama.

During my two-year term as president of the Mobile Area Chamber of Commerce, I worked very closely with Ideal Basic Industries while making their decision to locate their new cement plant. At this time, I observed Ideal Basic Industries keen awareness of protecting the environment and their concern for building environmental safeguards in their plant.

My concern for this new cement plant is two-fold. First, the necessity for having an environmental safe plant in our community, and, secondly, I live in the area of the location of this new plant.

Ideal Basic Industries new plant will have a tremendous economic impact on our area to provide much-needed jobs to our area people.

I, therefore, strongly urge the US Environmental Protection Agency to issue a permit for this new plant.

Thank you.

MR. ZELLER: Thank you, sir.

Next, I would like to ask Mr. Ernest Todd, president of Mobile Area Chamber of Commerce.

Mr. Todd?

MR. TODD: Thank you, Mr. Chairman.

I have a statement from the Mobile Area Chamber of Commerce entered in the record in support of the permit applications of Ideal Basic Industries to begin construction of their plant in the Theodore Industrial Area. The Chamber has worked closely with Ideal Basic Industries over the past two years and been impressed with their endeavors to maintain environmental quality, and enhance the communities where they operate.

Indicative of this, it is the participation of Ideal Basic in environmental seminars and symposiums each time indicating a strong adherence to establish regulatory control and environmental standards. We are certain that, upon review of the information submitted by Ideal as part of their Environmental Impact Statement, you will find that theirs is a total commitment to the protection and, where possible, improvement of the environment in compliance with state and federal controls.

Several committees of the Chamber have worked closely with Ideal in helping to bring this corporate citizen to Mobile, and, based upon the above, the Mobile Area Chamber of Commerce requests that EPA grant the necessary permits for Ideal Basics to begin construction at the earliest possible time.

Thank you.

MR. ZELLER: Thank you, Mr. Todd.

Next, I would like to call on Mr. Thomas Martenstein, who is president of Smith Kelly Supply Company.

Mr. Martenstein?

MR. MARTENSTEIN: My name is Thomas Martenstein. I am president of Smith Kelly Supply Company. I would like to make the following comment in support of construction of this facility.

To make it brief, Ideal Basic has been foremost in the cement manufacturing field for many years. Our association with this fine company has been more than satisfactory. Their efforts to provide a superior product in sufficient quantities as well as furnish engineering services to assist in concrete design has contributed, to a large extent, for our continued use of their product. Quality control in application of the latest engineering concepts with environmental protection has established its firm as a leader in its field.

The continued growth of the Gulf South area demands additional supplies of cement located on the water, bridges, and peers and commercial buildings suit themselves to construction using concrete. Adequate labor market in this area provides additional incentive for placing the plant in Theodore, and I am sure that upon completion of these facilities , Ideal Basic Industries will have constructed one of the most advanced cement manufacturing facilities in existence today, and I wholeheartedly endorse the construction of the plant.

Thank you.

MR. ZELLER: Thank you, Mr. Martenstein.

Next, I would like to call on Mr. J. Edwin Rehm, who is the senior vice-president of the associated industries of Alabama.

Mr. Rehm?

Please correct me if I pronounce your name incorrectly.

MR. REHM: I am J. Edwin Rehm, senior vice-president of associated industries of Alabama.

For the sake of brevity, I would like to enter into the record this letter on behalf of Ideal Basic's being granted a permit, not only for the cement manufacturing plant in Theodore, but for the quarry in Monroe County. They are organization with much integrity and character, and they would make us very good neighbors.

Thank you.

MR. ZELLER: Thank you for your comments, Mr. Rehm.

Next, I would like to call on Mr. W. M. Collins, who is vice-president of the First National Bank here in

Mobile.

Mr. Collins?

MR. COLLINS: Mr. Chairman, my name is W. M. Collins, and I am vice-president and director of industrial development fo: First National Bank here in Mobile. I came here tonight to make a statement in favor of the two projects proposed by Ideal Basic Industries.

I have known Ideal Basic for many years, and can attest to the fact that they have been good corporate citizens wherever their plants have been, wherever they have located their plants. I have been in the industrial development field for quite some time, and have never seen a company go to the extent that Ideal Basic Industries has gone to be sure that the Environment is protected at the new plant site.

This company has surely walked the extra mile in order to insure the people of Mobile and Monroe Counties that they will be an asset to both communities. I would also like to take this opportunity to thank the Environmental Protection Agency for the opportunity of making my views known at this public hearing.

Thank you.

MR. ZELLER: Thank you, Mr. Collins.

Next, I would like to ask Mr. W. H. Black, Jr., chief administrative officer of the Alabama Dock Department.

Mr. Black?

MR. BLACK: I am W. H. Black, chief administrative officer of Alabama Dock Department. Mr. Robert M. Hope, of Alabama State Docks, has asked me to file this statement in support of this proposed project of Ideal Cement Company and request the earliest possible date for issuance of their permit.

Thank you.

MR. ZELLER: Thank you.

Next, I would ask Mr. Arthur B. Pope, president of Pope ---

MR. POPE: Thank you, Mr. Chairman.

I would like to emulate the more astute politicians who have gone before us this evening and leave my remarks to the last paragraph of the letter that I will file.

> I believe that consideration of the environment by industry has become a recognized fact of life, and as good corporate citizens demonstrate their sense of responsibility in this area, they should receive close cooperation in reaching their goals. We ask for a minimum of delay and harassment. I sincerely believe Ideal Cement has earned the right to proceed with their plans and urge the EPA to approve that application without further delay.

Thank you.

MR. ZELLER: Thank you, Mr. Pope.

Next, I'd like to call on Mr. Robert E. Schnitzer, executive vice-president of Coosa Alabama River Improvement Association.

Mr. Schnitzer?

MR. SCHNITZER: Mr. Chairman, I would like to read a portion of our statement. My name is Robert E. Schnitzer. I am executive vice-president of the Coosa Alabama River Improvement Association. I reside in Montgomery, Alabama, the location of the headquarters of our association.

I appear at this meeting to express the strong support of our association for the granting of the necessary permits and approvals for Ideal Basic Industries to construct and operate a new cement plant at Theodore and the quarry in Monroe County, Alabama.

It's the type of development that has a primary interest for our entire river basin stretching from Monroe Bay to Rome, Georgia. We have studied the draft environmental impact statement and find the proposed construction and treatment completely satisfactory.

Our association recognizes the importance of environmental considerations in planning new developments and do, therefore, consider Ideal's proposals environmentally sound. The basic premise of the accounting of our association clear back in the 1890's was to improve the economic opportunities of the younger generations of Alabamians by creating job opportunities in our River Basin.

The construction of Ideal's cement plant and quarry is the type of development we have continuously sought. We, therefore, recommend that no further obstacles be placed before Ideal Basic Industries in carrying out at great financial cost their thoroughly studied and soundly planned installations in Alabama.

We request that all necessary permits and approvals be expeditiously granted.

Thank you for this opportunity to appear before you.

MR. ZELLER: Thank you.

Next, I will call on Mr. Albert J. Meacham, executive vice-president and general manager of Roberts Brothers, Incorporated.

Mr. Meacham?

MR. MEACHAM: My name is Robert J. Meacham, executive vice-president and general manager of Roberts Brothers, Incorporated, and also president of the Mobile County Board of Realtors.

However, I am in favor of the immediate permitting of plant construction of Ideal's Theodore Cement Plant for the following reasons:

It is my understanding that Ideal has met every standard imposed by state and federal agencies relating to environmental safeguards. Cement is in short supply in other parts of the country and could possibly become so in Mobile if permission to build this plant is denied.

Construction of the plant should result in economic benefits to the City of Mobile in the form of additional employment and a stable cement supply. It should also have a positive effect on housing construction. Ideal has already proved itself to be a good citizen of the community, having been in operation here since 1947. During that time, the company has been actively involved in many worthwhile civic projects, including the United Fund, the Mobile Baptist College, and the Chamber of Commerce.

In view of Ideal's past record, it is reasonable to assume that the company will continue to operate responsibily and intelligently in its relationship with the Mobile community.

Thank you.

MR. ZELLER. Thank you, Mr. Meacham.

Next, I call on Ezrah Trice.

Mr. Trice?

MR. TRICE: Mr. Chairman, I will just read a few of my last comments.

I am Ezrah Trice, executive vice-president of Southern Assistance Corporation. I have been associated in business with Ideal for many, many years. The cement industry is having a difficult time meeting the present demands for cement in this area and throughout the South. Unless production capacities increase, industry will not be able to supply the market adequately in a few years.

To meet this increased demand and remain competitive, Ideal must replace an old mill with a modern facility. All the studies have been completed and submitted to the necessary environmental agencies.

I strongly urge the permit be issued in order that this project can proceed as soon as possible.

Thank you.

MR. ZELLER: Thank you.

Next, I'd like to call on Mr. Charles Prater.

MR. PRATER: Mr. Chairman, I am Charlie Prater, president of the Tilmans Corner Chamber of Commerce.

I have a statement. In order to summarize it, I would like to say that the Chamber of Commerce is composed of approximately 40 businesses and residents in the Tilmans Corner-Theodore area. We would like to go on record as being in favor of Ideal Basic Industries coming to the area, and we look forward to having them as a neighbor.

MR. ZELLER: Thank you.

Next, I would like to call on Ms. Debbie Howard, a private citizen.

MS. HOWARD: My name is Debbie Howard, and as a resident of Dog River and life-long citizen of Mobile and, more importantly, a mother, I would like to express my full support of the proposed Ideal Basic Industries Cement Plant at the Theodore Industrial Park.

Ideal Basic Industries not only has taken every step available to insure the environmentally safe operation of their proposed plant, they have gone beyond the call of duty by seeking the ideas, opinions, and views, of the citizens of Mobile. I feel that when a company takes this approach, not to mention the expense, we must all stop and look at the situation realistically, not to close our minds to the fact that because a new industry is going to build here, that will automatically pollute the air and water. We lose our sense of perspective when we automatically equate new industry with new problems.

It'd be much better if we dealt with the problems and took a closer, more realistic view of the opportunities.

When we can have our cake and eat it, too, why not take it? Not only will the plant boost the economy in the Mobile area, and with inflation and unemployment at a peak, as it is now, this factor must be given significant importance.

Ideal is using every measure available to insure the environmentally safe operation of the plant, not to mention all the costly energy-saving techniques. I oftentimes wonder, in many citizen-oriented attempts to insure a pollutant-free environment, the objectives have transversed a thin line from being pro-environment to one of basic anti-industry.

I support Ideal Basic Industries' proposed cement plant to be located in the Theodore Industrial Park. Thank you.

MR. ZELLER: Thank you for being here tonight and for those comments for the record.

Next, I would like to call on Mr. Jerry A. Greenough, who is finance chairman, City of Mobile.

MR. GREENOUGH: Thank you for the pleasure of being here this evening. I would like to say that I am elected to Mobile city commission, 1973, and continue under district judge's order.

There's another state representative in the back. I feel it's my duty to call your attention to that, Mr. Thomas Sandusky (indicating), against the wall.

Incidentally, I should have said that I joined with the statement filed earlier this evening for the City of Mobile in support of the project, and I'm here to speak as chairman of the Alabama Coastal Area Board, although I do not speak on behalf of the board. The reason I make that technical point is that the board has not yet finally adopted its coastal area plan, and, therefore, cannot take formal positions on these matters yet.

I have had the technical staff of the Coastal Area Board, headed by Dr. Bruce Tripkee, review the EIS, as well as I have reviewed it, and he and the technical staff share my view, which I will state -- in our conclusion that, as an overall appraisal on the state of the economics, Mobile will be benefited by the creation of approximately 500 jobs, both in plant operation and local services, at a very small cost environmentally, and I support the project.

Thank you.

MR. ZELLER: Thank you, sir.

Next, I'd like to call on Mr. B. Milling, president of the Underwood Builders Supply Company.

Mr. Milling?

MR. MILLING: My name is Burt Milling, president of Underwood Builders Supply Company, Incorporated, Mobile, Alabama, and I speak in support of Ideal Basic Industries' application for permit to construct a cement manufacturing plant in the Theodore Industrial Complex.

This is the second time that Ideal Basic has come to help Mobile. In 1947, Ideal Basic activated a standby aluminum plant built by the United States Government for our protection during World War II. This move provided a local supply of a critical shortage of building material, and gave Mobile another stable industry. From that day, Ideal Basic has become an integral part of our community, supporting our churches, schools, United Fund, civic clubs, Chamber of Commerce, in fact, every facet of our city and area.

Years of personal contact have shown me that this is a great firm, sensitive to our community's every need, and including environmental requirements. They should be permitted to construct this new facility in order that the Mobile area may continue to benefit from the tremendous contribution they make to us.

Thank you.

MR. ZELLER: Thank you, Mr. Milling.

Next, I'd like to call on Sheldon Morgan.

Mr. Morgan?

MR. MORGAN: My name is Sheldon Morgan speaking as president of the Warrior-Tombigbee Association, which is headquartered in Birmingham, Alabama.

We have followed the plans of Ideal Basic Industries since their initial investigation of the proposed cement plant at the Theodore Industrial Park. Our first contact with them in this regard was in 1973. We will continue to work with them during the planning of the project, have been impressed with the minute details given to each element of the plan.

More particularly, we have seen the company observe comprehensive efforts in meeting the necessities to provide at the least possible impact to the environment. Environmental impact statement draft which we have read substantiates in detail their planned efforts to maintain environmental quality.

As president of the Warrior-Tombigbee Association and also as chairman of the Port and Waterways Committee of the Chamber of Commerce here in Mobile, I have had the opportunity of working to obtain the deep-water channel at Theodore Industrial Park. This has given me an opportunity to become very familiar with the Ideal Basic Management, and I have the greatest respect for them, the company and its people, and its my opinion that the project will provide considerable impact to the economy here in Mobile at a time when many of our construction workers are finding some of the larger projects coming to a close. This will be a very timely construction project to help carry on needed jobs for our people.

We favor the construction here at the earliest possible date.

MR. ZELLER: Thank you.

Next, I'd like to call on Mr. Ralph Whitson, who is executive director of the Mid Gulf Business Roundtable.

MR. WHITSON: I am Ralph Whitson, executive director of the Mid Gulf Business Roundtable. The Mid Gulf Business Roundtable is a non-profit association of major construction users in the Mobile-Mid Gulf area. It is concerned with maintaining a healthy construction climate for industrial growth balanced with proper environmental control measures.

Members of the association have been polled, and unanimously support Ideal Basic Industries' planned new Gulf Coast Cement Plant project. We believe that Ideal's acceptance of their environmental responsibility on this project is demonstrated by the extensive control measures to be incorporated in their process as outlined in EPA's draft environmental impact statement.

Ideal has been a long-time member of the Mobile industrial community. They have proven themselves to be a reputable company. Their construction and operation of this proposed large modern cement plant will be an outstanding addition to the industrial expansion in this area and in Alabama.

Thank you.

MR. ZELLER: Thank you, Mr. Whitson.

Next, I'd like to call on Mr. Frank Schmidt, president of the Mobile Industrial Development Board, Mobile Area Chamber of Commerce.

MR. SCHMIDT: Thank you, Mr. Chairman.

The Industrial Development Board of the City of Mobile and property known as the Theodore Industrial Area has requested that I, Frank Schmidt, president, submit the following statement in writing, as well as the statement to the public meeting.

We believe it is in the interest of the general good of all that all relevant considerations be examined with care and caution as has apparently been devoted to the development of the draft environmental impact statement presented by the EPA for Ideal Basic Industries. The findings proposed in this draft clearly expose no significant detriment to our community and, in fact, exhibits numerous benefits available to industries such as Ideal.

The board urges that all comments be quickly correlated, absorbed to their various purposes, and speedy determination of procedures be made so that this matter may not be unnecessarily delayed any longer.

MR. ZELLER: Thank you, sir.

Next, I'd like to call on Mr. Peter Kenyon, who is president of the Mobile Traffic and Transportation Club.

Mr. Kenyon?

MR. KENYON: Mr. Chairman, I am Peter Kenyon. I am president of the Mobile Transportation Club. I'd like to read into the record the following statements submitted by that club:

> The Mobile Traffic and Transportation Club is composed of membership representing business and industry in the Mobile area, primarily those affected by the transportation sector of our economy. All modes are represented.
>
> The club was established in 1940. At present, it has a membership of over 460. We have followed with interest developments pertaining to the Ideal Basic Industries proposed plant facility in Theodore Industrial Park and the quarry on the Alabama River in Monroe County.
>
> We have noted further that the project relies heavily on the transportation industry to maintain their operations, both for inbound raw materials and outbound finished products. Knowing the economic benefits derived from transportation services in the local economy, having studied the plans for the Ideal Basic Industries facilities, we feel confident that granting a permit to Ideal will not only be in the best interest of this fine company, but will benefit the local economy by providing jobs and setups.

We would like to recommend the granting of the permit in question.

I would like, additionally, if I may, to submit a statement as secretary and treasurer on behalf of the Propeller Club of the United States Port of Mobile. The statement reads as follows:

The Propeller Club of the United States, Mobile Chapter, has a vital interest in marine transportation and of its related activities. It is primarily interested in transportation system of this country as it pertains to the role of the American flag carriers.

The case of Ideal Basic Industries is one that we heartily support, the plan to establish a manufacturing facility in the Theodore Industrial Park as well as quarry operations in Monroe County. Ideal Basic Industries has supported the American Merchant Marine and has been active in Marine operations for many years.

We know them. They are a company of high integrity, and we recommend favorable action on that request.

MR. ZELLER: Thank you, Mr. Kenyon.

Next, I'd like to call on Mr. H. R. Callahan.

Mr. Callahan?

A VOICE: He was here already . . . (discontinuing)

MR. ZELLER: We will move on, then, and ask Mr. Bruce H. Hood, secretary-treasurer of Monroeville, Alabama, Industrial Board.

Mr. Hood?

MR. HOOD: Mr. Chairman, In order to save time . . . (discontinuing)

MR. ZELLER: If you will come to the podium and say that briefly for the record.

MR. HOOD: I am Bruce Hood, secretary-treasurer of the Monroeville Industrial Development Board. We have a letter that we have not been able to get signed by the chairman due to unfortunate circumstances, but we heartily endorse Ideal Cement, the Theodore complex in Monroe County.

MR. ZELLER: Thank you, Mr. Hood. The record will be kept open for two weeks, which will probably give you time to get your letter in. We appreciate your being here tonight.

Mr. Cren Pritchett, president of Monroe Area Chamber of Commerce.

Mr. Pritchett?

MR. PRITCHETT: Thank you.

I am Cren Pritchett. I am here tonight representing the Monroe Area Chamber of Commerce in Monroeville. I have a letter which I would like to submit in support of Ideal Basic Industries, and I will read just a portion of this letter:

> Based on the information available to us, we feel that the environmental impact of the operation of the quarry by Ideal Basic Industries will have minimal significance. The construction and subsequent operation of this facility should result in social and economic benefit to the Monroe area.
>
> We would welcome this industry without hesitation and look forward to having them in our area. I would also like to say that our office has received only favorable comments and no adverse information whatsoever concerning Ideal Basic Industries.

Thank you.

MR. ZELLER: Thank you, Mr. Pritchett.

Mr. O. L. Biggs, Judge Probate, Monroe County Commission.

Judge Biggs?

JUDGE BIGGS: Thank you, Mr. Chairman.

My name is O. L. Biggs, Judge of Probate, Office of the President of Monroe County Commission. I have a statement from the Monroe County Commission asking that the limestone quarry project in Monroe County be approved, and we certainly ask for your speedy approval of that project.

I also have a statement for support from a noted conservationist in the State of Alabama who is also Alabama's delegate to the National Wildlife Federation, Mr. R. B. Williams, III, and he gives his statement of support to the project.

I also have a statement from the president of our local Monroe County Conservation Club, Mr. Johnny Synder, giving the full support of this project by the conservation club. There is no opposition to this project in Monroe County, and I would like to say that representing a county that led the State of Alabama in industrial development in 1976, and ranking number two in 1977, we look forward to welcoming Ideal Basic as an outstanding corporate citizen to our county.

Thank you.

MR. ZELLER: Thank you, Judge Biggs. We appreciate your being here.

Next, I'd like to call on Dr. Fred Cushing, Jr., president of the Mobile County Wildlife Conservation Association.

Dr. Cushing?

DR. CUSHING: Mr. Chairman, I am Fred Cushing, president of the Mobile County Wildlife Conservation Association. I would like to read the following statement from this association:

At a meeting of the board of directors of Mobile County Wildlife and Conservation Association duly called and held on June 22, 1978, to consider, amongst other things, the environmental impact statement of Ideal Basic Industries covering its proposed construction of a cement plant at the Theodore Industrial Park in Mobile County, Alabama.

Proceedings were had and resolutions passed. Ideal Basic Industries made a presentation to Mobile County Wildlife and Conservation Association covering its environmental impact statement plans for construction of a cement plant at the Theodore Industrial Park.

Questions from the floor were invited, and discussions of various portions of the proposed plans with respect to the impact on the environment were held.

The spokesmen for Ideal Basic Industries were then requested to leave the meeting while the directors of Mobile County Wildlife and Conservation Association discussed the matter and motion duly made and seconded. The following resolution was adopted:

Be it resolved that the Mobile County Wildlife and Conservation Association go on record as giving affirmative approval to the proposed plans of Ideal Basic Industries for construction of its plant at Theodore Industrial Park in Mobile County, Alabama, as described in its environmental impact statement.

On vote, the above resolution passed unanimously, A motion was then made from the floor that the records of Mobile County Wildlife and Conservation Association reflect that the vote on this issue was unanimous, and it was so ordered.

I hereby certify that the above resolution has not been repealed or amended.

Thank you.

MR. ZELLER: I thank you very much, Dr. Cushing. We appreciate your being here.

Next, I would like to call on Mr. L. D. Strickland, who is chief of the Hollinger Island Patrol.

Mr. Strickland?

MR. STRICKLAND: Mr. Chairman, I am chief of the Community Patrol in Hollingers Island, and I will be going on record. I don't have a written statement to leave you, but I have been in close contact with the engineers for 10 years, and I have compiled a few environmental statements together. We have studied them, and Ideal Basic seems to be well, in some cases more, in line with the requirements than some of the proposed requirements.

I have been in touch with Mr. John Thommason, and have been working closely with him, and, also, with Mr. Mullins from Brown and Root Corporation. We have a community patrol there that we think is second to none, and I live half a block from where they are building the plant. So, I feel I am right in the eye of the source.

I represent 3,500 people, and we have gone through their support not only by voice, but have obtained a petition that I am getting signed, and I will go on record as saying that I will have a 90 percent participation in support of this project, and we will help every way we can, and we will be there.

Thank you for the opportunity. We do support it even though I'm right at it. That's all right. We know what the circumstances are. I've studied this thing, and I know it's to be forward in 1992. This will be different situation than it is at present, but I do support it. We do support it, and we will continue to support it because it involves more than just a support for the community. It also helps our employment of the area, and we go on record as supporting it 100 percent, and we continue to do so.

Thank you very much.

MR. ZELLER: Thank you, Mr. Strickland.

Next, I would like to call on Jeanne King, a private citizen.

MS. KING: My name is Jeanne King, and I appear before you as an interested private citizen. I am neither a self-appointed environmental expert, nor a self-anointed economic Einstein. I must depend on my technical expertise within these particular areas to those within our community whose formal and informal education makes them a qualified evaluator of such matters.

My vantage point is basically two-fold, that of a private citizen, and that of one whose profession has involved them in working with consumer groups and consumer legislation at the state and federal level for over 10 years.

In view of the total openness and honesty of Ideal Basic Industries in locating a plant here, and in recognition of the significant and costly actions taken by this company to insure this community and its citizens that the environmental impact is of low and moderate significance, I wish to enter my statement of strong support.

I have been most impressed with this company's eager willingness to work within this community and to not only seek, but most importantly, to incorporate the ideas and opinions, and, yes, recommendations of diverse groups within the community into its plans.

Certainly, this company's genuine sincerity and most expensive exercise to insure safety is a credit not only to Ideal Basic Industries, but to this community and its citizens for it signifies to us that industry working together with a community can achieve a position equitable to all, economically and environmentally.

As a mother of two children, I am keenly aware that the choices I have to make today must not challenge the capabilities of my own children to survive, not only economically, but so very important, to survive environmentally.

We have the responsibility of making choices that would provide a Mobile that is both environmentally safe and economically secure. Ideal Basic Industries through its efforts has convinced me, as a private citizen, that they, too, seek the same objective. They have made the choice of accepting the responsibility of doing what is right by this community. Not much more that we can demand of any industry.

If we are truly logical, and if we are truly realistic, certainly no industry has ever demanded more of itself in Mobile, Alabama, than has Ideal Basic Industries. Ideal Basic Industries has truly exhibited a corporate capability of cooperative teamwork at the community level.

Thank you.

MR. ZELLER: Thank you, Ms. King. We appreciate your being here tonight.

Next, I'd like to call on Mr. Morris L. Sheridan, president of the Home Builders of Metropolitan Mobile. Mr. Sheridan?

MR. SHERIDAN: Mr. Chairman, ladies and gentlemen, in the interest of saving time I wish to submit this written statement urging the approval of the necessary permits to enable Ideal to construct its plant in the Theodore area.

Thank you very much.

MR. ZELLER: Thank you, Mr. Sheridan.

Next, I'd like to call on Mr. E. L. Hobbs, regional sales manager for L and N Railroad.

Mr. Hobbs?

MR. HOBBS: Mr. Chairman, I am E. L. Hobbs, regional sales manager for the L and N Railroad, Mobile, Alabama.

For the record, I have a statement from Mr. K. C. Dufferd, vice-president of operations of the Louisville and Nashville Railroad in Louisville, Kentucky, in strong support of this project.

Thank you very much.

(Presenting to the Reporter)

ATLANTA REPORTING COMPANY, INC.

MR. ZELLER: Thank you, Mr. Hobbs.

Next, I'd like to call on Mr. J. J. Reynolds, a self-employed consultant.

Mr. Reynolds?

A VOICE: No comment.

MR. ZELLER: All right. Thank you.

Next, I'd like to call on Ms. Marisa Gardner. Ms. Gardner, would you come forward, please. Ms. Gardner represents the Health and Environment Community Organization.

MS. GARDNER: Good evening, Mr. Zeller, ladies and gentlemen. I am favorable impressed with the draft environmental impact statement and with the concern shown by Ideal Basic Cement Company.

I feel I must point out ideas for your benefit so that, should permission to build in the Theodore Industrial Park be given, you could say you were told of possible problems.

In a letter to the editor printed February 2, 1978, I stated that the good people of Ideal Cement have a beautiful plan to build a plant. However, I have my doubts as to Theodore being the right spot, and I am still of the same opinion.

Now, in regard to the environmental impact statement, borrowing from the battleground terminology, two Norwegian meteorologists, while seeking new terminology for movements and masses of air, named points where two air masses met and crashed as the front. As most of you know, the atmosphere is a mixture of gasses that are highly elastic and easily set in motion.

On a calm, sunny day, the atmosphere seems to be non-existent, but it becomes visable and destructive when its cargo of water vapor is condensed in the form of racing storm clouds. Both sea breeze and land breeze circulations contribute to ventilation and dispersion of emitted materials. Sea and land breezes can be brought about by scale weather pattern such as highs, lows, or frontal system, but is more appropriate to discuss the small-scale phenomena which take the form of two vertical circulation over most coastal areas.

Mesoscale influences affecting Mobile increase greatly in the summer season. Sea breezes created by very localized temperature are established along the coastline because of the much greater heat capacity of the sea as opposed to the land.

The cooler sea air is denser and sinks, while the hotter land air rises while mesoscale breezes help clean the air through dilution of emitted material. Several situations have been observed where emitted material once caught in a sea breeze has been recirculated towards its point of release.

Modern technology, with its high-speed computers, is of little use in most of man's direct confrontations with the weather. We can predict it, but we cannot govern it. Excuse me -- my pronunciation.

The old saying has been everybody talks about the weather, but no one can do anything about it. I believe the time has come for everyone to realize that major changes are needed so that in the future cities will have to be planned scientifically to have controlled micro weather so that life can be more pleasant.

Hundreds of acres of pavement and masonry absorbing and holding heat do affect local weather conditions. When these changes are combined with quantities of industrial pollution, the results could be devastating. There were 20 reports of tornadoes in the vicinity of Mobile over a 13-year period according to Paul's, a study which was published in 1969 -- predicted the increase in the number of storms in the Mobile area.

Again, I have nothing against cement. There's plenty around my house. This is not a personal problem. It is an expression of how to reach the best conclusion for the Mobile area. We have so much to be thankful for and probably are not aware of the true potential which we have in the Mobile area.

Thank you very much.

MR. ZELLER: Thank you, Ms. Gardner. We appreciate your being here tonight. Your comments will be responded to in the environmental impact statement when it comes out.

Next, I would like to call Mr. N. J. Walton, chairman of the South Alabama Regional Planning Commission.

Mr. Walton?

MR. WALTON: Thank you, Mr. Chairman.

I am Norman J. Walton, chairman of the South Alabama Regional Planning Commission with offices located in International Trade Center, Mobile, Alabama. As the designated 208 agency and agency with regional responsibility for land use, housing, transportation, and transportation related to air quality and maintenance planning, the staff has reviewed the subject, environmental impact statement, for consistency with the draft 208 plan, the 701 plan, and the South Mobile County plan.

Review of the environmental impact statement by the 208 staff shows consistency with the adopted Alabama Water Improvement Commission policy of discharge to the Theodore ship channel and complies with the recommended application of the best management practices during construction for the control of non point source from the site.

Environmental impact statement also identifies practices to be used for the control of non-point sources from raw materials storage in handling process areas in finished product storage handling after the plant is in operation. These practices are also consistent with the recommendation of the 208 plan.

The environmental impact statement identifies some increases in particulate and sulfur dioxide levels resulting from the operation of this facility. The documentation shows that these increases to be within the National Ambient Air Quality Standards and to meet the Environmental Protection Agency's protection for the significant deterioration requirements of these resources.

The proposed Theodore site development plan contained in the environmental impact statement has been found to take into consideration the total environment of the area. Ideal is to be commended in their approach in their proposed layout of the complex including rail and roads in such a manner as to protect the sensitive area of the plant site to enhance the remaining portion of the site, in the same time to mitigate the unavoidable impacts during construction of the facility. The South Alabama Regional Planning Commission recommends that the proposed permits be issued that will allow Ideal Basic Cement to begin construction of the facilities as described in the environmental impact statement.

We are of the opinion that this facility, as proposed, will contribute significantly to the economy of the Mobile area and provide long-term employment and minimum environment effects.

I want that statement, and I also have a statement that I'm not going to read from J. S. Walton Company I'd like to enter into the record at this time.

Thank you.

MR. ZELLER: Thank you, Mr. Walton.

Next, I'd like to call on Myrt Jones, president of the Mobile Bay Audubon Society.

Ms. Jones?

MS. JONES: Sorry about that, gentlemen. I am Myrt Jones, president of the Mobile Bay Audubon Society. I don't have a prepared statement, so I'll have to hope that you are taking your Nodoz Tablets and will stay with me. I will not be very long.

Ideal Cement has been a breath of fresh air in an open-handed manner presenting their case for building a cement facility in the Mobile community. I, for one, applaud John Thommason and the others responsible for the unusual approach. I hope their EIS, EPA's EIS set a precedent for future industrial and commercial and residential interests planning on building in Mobile.

Ideal presents well thought out and unique and workable solutions in trying to minimize the environmental consequences from their construction and production impacts at both Theodore and Monroe County sites. Some of the proposed blue ribbon actions will be their dry process in making cement allowing the recycling of collected waste emissions, their use of chipping and mulching of land clearing, their proposed method of storm water controls, and stabilization methods to counter erosion, future reclamation of the quarry sites for pasture, and suppression of dust with water sprays.

I would like to pass on a few constructive thoughts. Mobile County is a non-attainment area for photochemical oxidants and also for particulates. I would, therefore, like to see more covered conveyor systems, other fugitive dust release to control other fugitive dust releases, and no mention was made in the summary of whether the barges, the trucks, and the railroad transportation system would have covers to control the dust; that the underground diesel and gasoline tanks at both sites be in areas that are impervious in case of leaks. All the plans can go astray if a contractor is not qualified and understands and properly enforces good land clearing and management practices. One of my major concerns at Theodore site is, of course, the impacts on water quality, both in the ship channel and North Deer River. The same applies to the streams in the Monroe property.

I would like to thank Ideal for considering my previous concern and suggestion in their relocating the railroad corridor and the coal storage area. In looking through the summary, I notice some filling of wetlands will occur in conjunction with the access corridors. In order to lessen water quality impacts, my suggestion would be to use more pile supported structures for both railroad and road to lessen these impacts and to move the catchment basin a little more to the south. Culverts in many instances do not allow normal and proper drainage. The other possible alternative to consider is to use a permeable surface for the road and parking lot. This could soften stormwater runoff and promote recharging of aquifers. Chipping and mulching of land clearing waste is an advanced method of recycling waste. I hope it is used instead of the pit burning and land filling methods, both of which are a waste of resources plus causing environmental problems. Consideration could be given to finding a local person willing to carry off and use excess as fuel or firewood. Ideal could consider using the 50 acres of modified longleaf pine to be cleared as a supplemental fuel with either the oil to preheat the kiln and produce pilot (inaudible) for coal burners or supplement with the coal.

The same idea could be used for the chip and mulching material. As regarding the pine stumps, railroad cars go through Mobile all the time heading to a destination that has a need for these items.

On page 40 of the summary, the oil and metal

ATLANTA REPORTING COMPANY, INC.

wastes will be separated and sold for recyclings. Use of waste oil is being used as a supplemental fuel. To control general storm water runoff, a catchment area is to be constructed at both sites.

For the quarry site on page 127, which is a quote:

> Water for dust suppression will be obtained from the clarification basins, unquote.

This is not considered for the Theodore plant site. If more treatment would be needed in order to clarify the water at the plant site, I would hope this was promoted in order not to release the storm water into the fresh water marsh.

This would be an important recycling of a commodity that could become very short supply in the future. Every effort should be taken to re-use all waters collected at the plant site, too much emphasis is being placed on the natural cleaning and filtering features of marsh. These areas can be overloaded and then they die.

Natural impacts could be -- let's see. I finished this at 6:30. It's taking me a few minutes to get it together.

Natural impacts could be all an area of this sensitivity -- could handle without more from man. There are known, threatened, and endangered, and special concerned species that could be in this meandering tidal creek, and all precautions could be taken to afford this area the protection it needs. We have lost Middle Deer River.

Efforts must be truly made to protect North Fork of the river. According to page 86 of the summary, it seems that some construction activities could impact on the river before the catching basin is constructed. This should be reconsidered. Construction of docking facilities will require dredging of approximately 650,000 cubic yards of material. It was brought to my attention that a possible historical or archeological site may have been overlooked, and I understand that a research contract has been let to determine the possible importance of this site. After this research has been completed, I would suggest starting work with the dredging away from the water, cutting down, and carrying off material, the dry material, and possibly finding someone willing to re-use it, such as the topsoil and the underburden instead of ending it up in a Corps spoil deposition site. No mention is made of utility access corridors in the summary. A serious problem -- at the quarry site the limestone deposit's vary up to 95 feet in thickness. The average depth is 25 feet. A serious problem in coastal area of Alabama is trying to properly handle the disposal of millions of cubic yards of dredged spoil. Dewatering, reuse of this material could lessen the problem in the coastal area.

Some of the mine areas will need a filling material. Joint effort by Ideal, the Corps, the state docks, to give serious consideration of using this fall and filling of strip mining areas plus waste pulp from adjoining pulp and timber companies could possibly be used in the Monroe area.

Hundreds of empty railroad cars, trucks, and barges head north daily, and they could be used. This would be a good time to try and promote a waste recovery data process facility on the coast and throughout Alabama. Information regarding the different compositions of industrial wastes would be compiled, and sources or outlets for re-using this material could be found.

Gypsum and iron ore are just a few Ideal could consider looking for in the waste industrial powers. This would be a tremendous community service. I have climbed through one of the beautiful world ravines in the Monroe area hunting for fossilized sand dollars and shells.

In the summary it touches lightly on the threatened endangered species. It seems as if little research has been made to properly determine what the true losses may be. A good example is the red hill salamander. Now, I don't have any knowledge of this species, but if the quarry site is just outside the known range of this little fellow, I'd hope that more studies would be made and certainly stronger consideration to be given in keeping some of these wooded ravines natural.

I would like to suggest that more thought be given to leaving more than a 100-foot border along the streams. It seems as if 300 feet wouldn't be too much to ask, especially after looking at the scenic beauty of the small, delicate streams in the summer. These are areas that are so abundent with life.

Ideal has many other acres to mine, and I hope that they will leave the streams as natural as possible. I also hope that the bluffs will not be allowed to disappear under the bulldozer. Has any assessment been made to determine if the shallow aquafers, when disturbed -- what would this do to the water table in the streams?

These are just some of the thoughts I would like to pass on to Ideal for consideration, and I hope that we will continue a cooperative spirit and open policy because I believe you have opened the doors for what future industry should do in this community, and I would like to nominate John Thommason as president of the Chamber of Commerce because he has done such a tremendous job. Thank you.

MR. ZELLER: Thank you, Ms. Jones. We appreciate your being here.

(Applause)

MR. ZELLER: We appreciate your interest in the environment of this area. Your comments will be answered in the final environmental impact statement. We appreciate your time to very carefully review that document.

Next, I'd like to ask Dr. N. W. Gaillard. Dr. Gaillard, are you here, sir?

DR. GAILLARD: Thank you, sir. I am Nelson Gaillard, Sr., and I have long been associated with conservation here, but I learned long ago that -- man can't without industry, and, so, as much as I'm interested in protecting animals, I'm also interested in protecting humans and making us a living, so I have enjoyed studying this industry's request, and I endorse it, and I would like to state in studies I have found that some of my conservationists have two things that they have been concerned about. I don't think they have got any valid worry there, but, nevertheless they do.

One is dust, and the other is the runoff water that seeps through the storage that you will have there. Now, I certainly don't know how to run your mill and how best to construct it, but I would not worry too much about that because my family happened to have lived in the Purdue Hills area for the past 200 years, and they have certainly breathed more of that dust farming than you will spread over Mobile, and as far as the water seeping through that dust and getting into the drinking water, I wouldn't worry about that, either, because all the water they drink has been doing that, and, really, they have all lived a pretty long time.

(Laughter)

My father lived to be 103, but his brother didn't want water very much. That wasn't his favorite drink.

(Laughter)

He complained about it that it was making him too frisky. I think he meant he was too amorous. He was always concerned that he was going to be shot by some jealous husband. Neither the water or the dust -- he didn't complain very much because he lived to be 99.

I, too, was born in Purdue Hill, and I spent most of my life in Mobile, but I do get up whenever I can, and I have breathed a lot of that limestone dust. I don't believe it's going to shorten my life very much because I'm already 80, and I feel like I'm going to get out a normal lifespan.

I'm glad to endorse Basic's application and hope you, too, will approve it. Thank you, sir.

(Applause)

MR. ZELLER: Thank you, Doctor.

Next, I'd like to call Mr. Gregory Spies, director of Northern Gulfcoast Archeological Research Consortium, Incorporated. Mr. Spies?

MR. SPIES: Our concern -- my name is Gregory Spies. I am with Northern Gulfcoast Archeological Research Consortium in Mobile. Our concern is that we would like to see compliance with the federal laws concerning protection of cultural resources brought about at the plant site in Deer River, at the quarry site in Monroe County, and, also, at the dumping site on 24-mile bend, which is mentioned on page 75, I believe.

We know some sites that are significant in terms of National Register Criteria, and we would like to see that either the protection of these sites is brought about, or mitigation activities that would bring about salvage operations to cover cultural materials from these sites, and, if this is done, then we will be more than happy with Ideal Cement Company's plans.

MR. ZELLER: Thank you, Mr. Spies. I can assure you that there will be compliance with the federal laws, and one of the reasons for the environmental impact statement is to review all of the areas, one of which you have mentioned. I believe this is addressed in the impact statement. Your comments will certainly be addressed in the final impact statement.

MR. SPIES: A preliminary review of this EIS -- I don't know if the data is included in this that is currently being researched, but the data that is included in this EIS in our opinion does not comply with 36CFR800, or National Environmental Policy Act of 1966, or the Historic Preservation Act of 1974 or Executive Order 11093.

MR. HOWARD: Mr. Spies, I wonder if you have done a survey of the site. If you have any information available, or will make available to EPA, we have been in contact with state archeologists on this project.

MR. SPIES: Who is the state archeologist?

MR. HOWARD: I don't know.

MR. SPIES: I didn't know there was a state archeologist.

MR ZELLER: There is a statement in the EIS from -- I believe that is correct -- the state archeologist. It's my understanding in the draft EIS on it, the state archeologist was generally concerned that the site was satisfactory and raised no questions.

Let me echo Mr. Howard's comments. Certainly, our purpose here at this hearing is to gather information and to gather facts. Any information you have, any specific information, it's very important that we receive that, and will be responded to in Environmental Impact Statement as well as any additional review that is necessary as far as an opinion, rules, and regulations.

MR. SPIES: For instance, in this EIS I notice it's concerned with the Alabama Historical Commission which the acting state historical preservation officer as the acting director of the Alabama Historical Commission . . . (discontinuing)

I notice there was conference with the state level that I did not see any reference to like conference with Advisory Council on Historic Preservation in Washington, which would be required under 36CFR procedures. We know of some sites that aren't mentioned in this EIS for the Monroe County quarry site, and I understand investigations are currently being conducted on Deer River on a site that we located there after the original survey, and, also, one of the largest and most significant village prehistoric early formative woodland period. Village site is located at 24-mile bend.

There is just a brief mention of this site that we used as a dumping area for the burned lime waste. It's currently being used as a dumping area for the burning lime waste. That's how we know the location, and the site up there is approximately the area that we have observed is like 40 acres of village that dates approximately to anywhere from 2,000 BC to 500BC, and we would like to see that perhaps investigations of this site be performed. It does not bring about compliance with the dumping site.

MR. HOWARD: If you would, please, if you have some information, please submit it to Mr. Wood.

MR. SPIES: I'm going to.

MR. HOWARD: One point I would like to make -- have you reviewed the archeological survey and work done by the University of Alabama?

MR. SPIES: The University of Alabama? South Alabama?

MR. HOWARD: Yes, South Alabama.

MR. SPIES: We haven't seen the actual report. All we have seen is the mention of the report in this EIS. Our concern is just that the investigations will bring about compliance.

MR. ZELLER: We appreciate that concern. I assure you it will receive our attention.

Next, I'd like to call on Michael Rushing, Director of North Gulf Coast Archeological Research Consortium.

Mr. Rushing?

(No response)

MR. ZELLER: Do you have comments, Mr. Rushing?

MR. RUSHING: No.

MR. ZELLER: Thank you very much. We will consider your comments to be the same as Mr. Spies'.

That concludes the individuals who have signed cards at the beginning of this hearing and asked to be heard. Let me ask at this time is there anyone else here who would like to make a statement?

Yes, sir? Please come to the podium and state your name and affiliation.

MR. AGEE: Thank you, Mr. Chairman. I am Walter

Agee, Monroe County county commissioner.

I used to live in Purdue Hill close to lime quarry, and we, the undersigned, wish to express our sincere appreciation for Ideal's attitude they have shown us in coming to our community, particularly their openness and early communication with the community.

As the nearest resident to the limestone quarry to be constructed and operated by Ideal Basic Industries, Incorporated, we wish to express our wholehearted support to this project, and this (indicating) is a list of the people that live right here near the quarry in Monroe County (presenting).

MR. ZELLER: Thank you very much. We appreciate your being here.

Is there anyone else who would like to make a statement?

Yes, sir?

MR. LAMAR: Thank you, Mr. Chairman, for allowing me to make a statement. I am Horace D. Lamar, a resident of Mobile County and a landowner of Monroe County, and I should like to go on record as supporting both the Theodore Cement Plant and the quarry.

Okay. If I may, I should like to ask a question at this point, not to the panel, but to anyone who might be knowledgeable of these facts, if I may.

MR. ZELLER: Go ahead. You may ask the question.

MR. LAMAR: Thank you. I listen to letter that was read from Governor Wallace and the letter from Senator Allen. My question is this: If I remember correctly, no mention was made in either letter of the quarry, and I'm wondering if this is to be construed as disinterest on the part of the Governor and the Senator in that project.

MR. ZELLER: I believe most of those individuals you named would have to respond directly to that. It was my impression from the statements that were presented that both the individuals did support the environmental impact statement, and the environmental impact statement did deal with both issues.

So, whether it's directed or not, I think it was intended to support both of the issues involved. However, that's an issue you would have to specifically get from both individuals. Nevertheless, it was my impression they were supporting both the quarry and the cement plant.

Do you want to add to that?

MR. MORGAN: Yes, sir.

MR. ZELLER: I wonder, Mr. Morgan, if you would mind coming up. I would like to have this on the record, please. Mr. Morgan, I think you also read this statement. I would like to have you perhaps clarify that for the record.

MR. MORGAN: I am Sheldon Morgan, president of the

Warrior-Tombigbee Association.

I talked with Senator Allen's staff in his office in Washington this afternoon prior to the dispatch of the communication you received.

MR. ZELLER: Yes.

MR. MORGAN: This is the purpose of the hearing here tonight. They could file a written record with the Atlanta office of the EPA stating support of both the Theodore project and the Monroeville quarry.

MR. ZELLER: Thank you, sir. That was my impression from Senator Allen's telegram.

Mr. Martin?

MR. MARTIN: I am John Martin. I can assure you that the Governor supports both projects, and it was an oversight on his part that he did not contain that in his letter. I can assure you that he does.

MR. ZELLER: Thank you, Mr. Martin. I appreciate that. I think that clarifies the issue, Mr. Lamar.

Is there anyone else who would like to make a statement at this time?

(No response)

MR. ZELLER: If not, I would like to thank all of you on behalf of the Environmental Protection Agency for your attendence here, your participation, and your cooperation. We got through a lot of people's statements in good order, and I appreciate that very much.

Comment period on draft environmental impact statement for this project will remain open to the close of business, Thursday, July 10, 1978. Further submissions must be in writing to be included in the official record and should be sent to the attention of Mr. John Hagan, Chief of Environmental Impact Statement Branch, EPA, Region IV, 345 Courtland Street, Northeast, Atlanta.

The Environmental Protection Agency will take into consideration the evidence and statements presented tonight at this hearing and any other statements submitted between now and July 10, and we will make a determination regarding the permit based on these comments and all other materials in the record.

After making that determination, we will then inform all the persons who are here tonight, as well as those making additional comments between now and July 10. This will be the final determination of the agency and the agency decision respecting permit will be included in the final environmental impact statement for the cement plant and limestone quarry.

I thank you all again for being present here tonight. We appreciate your comments.

Let me ask once again is there anyone else who has anything they would like to offer for the record?

(No response)

MR. ZELLER: If not, we stand adjourned.

-o0o-

CERTIFICATE

STATE OF GEORGIA)
)
COUNTY OF FULTON)

I, Neal Causey, being a Court Reporter Certified by the State of Georgia and a Notary Public in and for the State of Georgia at Large, do hereby certify that the above and foregoing is a true and complete transcription of my stenographic notes taken at the hereinabove set out time and place and was reduced to typewriting by me personally.

I further certify that I am neither of kin nor counsel to any of the parties nor financially interested in the action.

WITNESS my hand and official seals at Atlanta, County of Fulton, State of Georgia, on this the 14th day of July, Anno Domini 1978.

Neal Causey
NEAL CAUSEY

(SEALS)

Notary Public, Georgia State at Large
My Commission Expires April 19, 1982

FEIS.2/ERRATA.1
8/20/78

ERRATA SHEET FOR PUBLIC HEARING TRANSCRIPT

The following list presents significant corrections identified by EPA through a review of the taped transcripts of the public hearing and of the signed statements submitted at the hearing.

Reference (Page and Line)	Correction
Page IV-4, line 2	"improvement" should read "pollutant."
Page IV-8, line 8	"reporting" should read "supporting."
Page IV-9, lines 17-19	Sentence should read: "The commenting period on the draft EIS will officially close July 3, 1978, and on July 10, 1978, for the draft NPDES permits."
Page IV-10, line 22	Sentence should read: "One, a cement plant was proposed..."
Page IV-11, line 8	"affluent" should read "effluent."
line 16	"A00028801" should read "AL0028801."
line 24	"known as 002" should read "number 002."
Page IV-13, line 17	"Suspended solvents" should read "suspended solids."
line 24	"mean" should read "meet."
Page IV-14, line 1	"preceding" should read "receiving."
Page IV-16, line 9	"Mr. James W. Ward" should read "Mr. James W. Warr."
Page IV-19, lines 9 and 14	"Mr. Sunny Callahan" should read "Mr. Sonny Callahan."
Page IV-21, lines 14, 15, 16	"Mr. Mimms" should read "Mr. Mims."
Page IV-23, line 24	"Mr. Newnan" should read "Mr. Noonan."
Page IV-25, line 22	"Mr. Thommason" should read "Mr. Thomason."
Page IV-27, line 6	Last sentence in paragraph should read: "It is also an area where the company's internal supply capabilities have become increasingly inadequate to to meet available market demand."

ERRATA SHEET (Continued)

Reference (Page and Line)	Correction
Page IV-30, line 1	Beginning of sentence should read: "A 300-foot wide greenbelt..."
Page IV-30, line 9	"nine" should read "mine."
Page IV-30, line 16	"connunities" should read "communities."
Page IV-32, line 5	"in" should read "and."
Page IV-32, line 25	Line should read: "groups and persons during the development..."
Page IV-33, lines 16-18	Line should read: "to encourage and provide for public participation and input into determinations that are required by these statutes."
Page IV-36, line 10	"comments" should read "conduct."
Page IV-37, line 7	"Bert Haas" should read "Bay Haas."
Page IV-37, line 25	"there" should read "they."
Page IV-40, line 12	"James M. Hiers" should read "James M. Hirs."
Page IV-40, line 17	"Douglas J. McCall" should read "Douglas J.McColl."
Page IV-40, lines 23, 24	"Mr. Lot" should read "Mr. Lott."
Page IV-41, line 10	"construction in" should read "constructing and."
Page IV-41, lines 13-16	Sentence should read: "Of particular note were the many mitigating alternatives which imposed inconvenience and extra cost in some cases to provide the best procedures possible."
Page IV-44, line 23	"peers" should read "piers."
Page IV-47, line 14	"leave" should read "limit."

FEIS.2/ERRATA.3
8/20/78

ERRATA SHEET (Continued)

Reference (Page and Line)	Correction
Page IV-48, lines 3,6,7,8	"Schnitzer" should read "Snetzer."
Page IV-48, line 20	"Monroe Bay" should read "Mobile Bay."
Page IV-49, line 3	"accounting" should read "founding."
Page IV-49, line 25	"Robert J. Meacham" should read "Albert J. Meacham."
Page IV-51, lines 2, 6	"Ezrah Trice" should read "Ezra Trice."
Page IV-53, line 17	Sentence should read: "Next, I would like to call on Mr. Gary A. Greenough, who is finance chairman, City of Mobile, and is also a member of the Alabama Coastal Area Board."
Page IV-54, line 10	"Dr. Bruce Tripkee" should read "Dr. Bruce Trickey."
Page IV-54, lines 19, 22	"Burt Milling" should read "Bert Milling."
Page IV-55, line 19	Sentence should read: "Next I'd like to call on Sheldon Morgan, who is President of the Warrior-Tombigbee Development Association."
Page IV-58, line 5	"and property known as" should read "a property owner in..."
Page IV-59, line 25	"setups" should read "services."
Page IV-67, lines 5,7	"Jeanne King" should read "Jean King."
Page IV-69, line 21	"Mr. K.C. Dufferd" should read "Mr. K.C. Dufford."
Page IV-71, line 10	"by scale weather" should read "by synoptic-scale weather."
Page IV-71, line 17	Line should read: "localized temperatures and density gradients."

ERRATA SHEET (Continued)

Reference (Page and Line)	Correction
Page IV-76, line 5	Sentence should read: "their use of chipping and mulching of land clearing wastes; their proposed method of storm water control clarification basins in hope to control to a greater degree suspended solids and turbidity."
Page IV-76, line 17	Line should read: "in areas that are clay lined and impervious."
Page IV-77, line 19	Word "(inaudible)" should read "flame."
Page IV-79, line 23	Sentence should read: "Dewatering, detoxifying, and reuse..."
Page IV-80, line 3	"fall" should read "spoil."
Page IV-80, line 15	"powers" should read "piles."
Page IV-80, line 17	"world" should read "wooded."
Page IV-82, line 5	"Nelson" should read "Wilson."
Page IV-86, line 22	"to Mr. Wood" should read "to us if you would."
Page IV-91, line 7	"could file" should read "have filed."

WRITTEN COMMENTS SUBMITTED

STATE OF ALABAMA
GOVERNOR'S OFFICE
MONTGOMERY 36104

GEORGE C. WALLACE
GOVERNOR

June 19, 1978

Mr. John C. White
Regional Administrator
Environmental Protection Agency
Region IV
345 Courtland Street, Northeast
Atlanta, Georgia 30308

Dear Mr. White:

For a number of years I have been actively involved with the several development agencies interested in developing the Theodore industrial area. During this period, the Alabama Development Office staff along with the staffs of the Alabama Water Improvement Commission, the Alabama Air Pollution Control Commission, and local agencies have worked in close cooperation. This cooperative effort has been necessary to assure that industry locating in the Theodore industrial area will create economic growth without jeopardy to our environment. We all want and expect a continuation of environmental quality not only for today but for the years to come.

I have been periodically informed by my staff of the extensive effort (both time and money) that has been made by the management of Ideal Basic Industries to retain the good environmental quality which is now present in the Theodore industrial area. I am hopeful that the permitting process for this fine company can be finalized at the earliest possible date, so that construction can commence, and the many construction workers required for this project can be employed.

Sincerely,

George C Wallace
George C. Wallace
Governor

GCW:MBf

H-2

June 26, 1978

Mr. John E. Hagan, III, Chief EIS Branch
U. S. Environmental Protection Agency
Region IV
345 Courtland St.
Atlanta, GA   30308

Dear Mr. Hagan:

As a member of the Alabama Legislature representing District 105 in the Alabama House of Representatives, it gives me a great deal of pleasure to submit this statement for the record supporting Ideal Basic Industries' permit applications to begin construction of their plant in the Theodore Industrial area.

My legislative district includes the Theodore area, and the current economic growth evidenced by the location of several major industries in this area is, to me, a sense of pride. It is particularly so when an operation of the magnitude of Ideal Basic exhibits the concern for environmental safety that they have, and as is evident in their EIS. Economic growth without concern for the impact on the environment would not be a desirable benefit to any area.

My district, more than any other House district in the Mobile area, would be materially affected by any environmental abuse. Therefore, knowing the safegaurds that Ideal is designing into their operations, I urge that EPA grant permits for construction at the earliest possible date.

Sol Glass

H-3

CITY OF MOBILE

MOBILE, ALABAMA
36601

COMMISSIONERS
GARY A. GREENOUGH
FINANCE
ROBERT B. DOYLE, JR.
PUBLIC SAFETY
LAMBERT C. MIMS
PUBLIC WORKS

PLEASE ADDRESS REPLY TO: P. O. Box 1827

June
26th
1978

Mr. John E. Hagan, III, Chief EIS Branch
U. S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30308

Dear Mr. Hagan:

As Mayor of the City of Mobile, it is my pleasure to submit this statement for the record supporting Ideal Basic Industries permit applications for construction of a portland cement plant in the Theodore Industrial Park area.

The City of Mobile is extremely proud to have Ideal Basic Industries choose Mobile as a location to expand their production capacity. During the year which has passed since the formal announcement by Ideal of its intentions, we have been impressed with their efforts to become a good corporate citizen for the Mobile area, and, of particular import to this proceeding, their concern for the maintenance of a quality environment.

We are certain you will find in reviewing their draft EIS that their concern for a quality environment extends from site development through and including plant operations. Their environmental safeguards are comprehensive and we are certain you will find these consistent with all criteria established for our area and their operations.

The economic benefits that will accrue to the Mobile area as a result of Ideal Basic's operations, over and above their initial capital investment, is a much-needed economic boost for our area. However, this statement of support should not be misconstrued as supportive only because of the benefits. Our support for Ideal is based on their real concern for environmental safety and compliance. It is

Mr. John E. Hagan
June 26, 1978
Page

with this in mind that we urge EPA to award the necessary permits so that construction may begin at the earliest possible date.

Yours sincerely,

Lambert C Mims

Lambert C. Mims
Mayor

LCM/rld

H-4

STATE OF ALABAMA
HOUSE OF REPRESENTATIVES
MONTGOMERY
36104

JOSEPH C. McCORQUODALE, JR.
SPEAKER

June 26, 1978

United States Environmental Protective Agency
Region 4
345 Courtland Street N. E.
Atlanta, Georgia 30308

Re: EPA 904-9-78-005
NPDES App # A10028819
Limestone Quarry
Monroe County Alabama

Gentlemen:

As Speaker of the Alabama House of Representatives and Representative of the District where the proposed Limestone Quarry will be operated, I want to express my full support for the project.

The economic benefit for Clarke and Monroe Counties will be good for our people. We are a rural area and our natural resources such as limestone must be developed to provide jobs. This area of our state and county is sparcely populated and an industry of this type will not create a problem. With present day technology and proper supervision economic development and environmental projects can and must be compatible.

Our population is very evenly divided between the black and white races. These are proud people and given the opportunity for jobs will work. This is that opportunity and I urge your favorable consideration.

Very truly yours,

Joe C. McCorquodale, Jr.

JM/dc

H-5

HOUSE DISTRICT 93
(Conecuh, Escambia, Monroe Counties)
Castleberry, Alabama

June 26, 1978

The U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N. E.
Atlanta, Georgia 30308

Re: EPA 904/9-78-005
NPDES Application Numbers:
AL0028819, Limestone Quarry
Applicant: Ideal Basic Industries, Inc.
Work: Construction and Operation of
the Limestone Quarry, Monroe
County, Alabama

Gentlemen:

As a Member of the State of Alabama, House of Representatives from House District 93 comprising Conecuh, Escambia and Monroe Counties, I herewith submit my statement of support for the constructic and operation of the Limestone Quarry, Monroe County, Alabama, by the Ideal Basic Industries, Inc.

I am convinced that the Ideal Basic Industries, Inc., will take every step necessary to protect the surrounding area from adverse or detrimental impacts. In addition, the construction and the operation of the Limestone Quarry will be a substantial economic boost to Monroe County and to the neighboring counties. The Limestone Quarry operation will help complement the development of the great Alabama-Coosa River System, and will be another step in bringing more jobs and better jobs to the people of our area.

I respectfully urge the approval of the construction and operation of this important and much needed project.

Respectfully submitted,

J. E. (Jimmy) Warren
Member House of Representatives
District 93

H-6

HOUSE OF REPRESENTATIVES
MONTGOMERY, ALABAMA 36104

DISTRICT NO. 95
BALDWIN AND MOBILE COUNTIES

JOHN M. McMILLAN, JR.
P. O. BOX 253
STOCKTON, ALABAMA
36579

COMMITTEES:
STATE ADMINISTRATION
CONSERVATION
COMMERCE AND TRANSPORTATION
LOCAL LEGISLATION NO. 3

June 26, 1978

Mr. John E. Hagan, III
Chief EIS Branch
Enviromental Protection Agency
Region IV
345 Courtland Street, N.C.
Atlanta, GA 30308

RE: NPDES NO. AL0028801
NPDES NO. AL0028819

Dear Mr. Hagan:

Based on my study of the draft Enviromental Impact Statement for Ideal Basic Industries Cement Plant and Limestone Quarry, it appears that every possible consideration has been given to enviromental concerns in the planning of these two facilities. I would certainly hope that permits for the construction and operation of these facilities might be issued.

I also think that Ideal is to be commended for the outstanding job they have done in planning these facilities in such a manner that our area might receive the economic advantages their location offers without the unpleasant side effects so often associated with industrial expansion.

Sincerely,

John McMillan, Jr.

JM:ca

H-7

NO. WDS.-CL. OF SVC.	PD. OR COLL.	CASH NO.	CHARGE TO THE ACCOUNT OF	THIS MESSAGE WILL BE SENT AS A TELEGRAM UNLESS IT IS OTHERWISE INDICATED.	PRESS	OVER NIGHT TELEGRAM
			GWA 185611			

Send the following message, subject to the Telegraph Company's conditions, rates and regulations, which are on file with regulatory authorities

June 26, 1978

HONORABLE HOWARD ZELLER
DEPUTY REGIONAL DIRECTOR
ENVIRONMENTAL PROTECTION AGENCY
c/o THE MUNICIPAL AUDITORIUM
MOBILE, ALABAMA

I SINCERELY WISH IT WERE POSSIBLE FOR ME TO BE AT THE PUBLIC HEARING THIS EVENING TO EXPRESS MY PERSONAL THOUGHTS ON THE PLANS TO CONSTRUCT A CEMENT PLANT IN THE THEODORE INDUSTRIAL PARK LET ME ASSURE YOU OF MY INTEREST AND MY SUPPORT FOR THE PLANT. SUCH A FACILITY WILL BE A SIGNIFICANT ADDITION TO THE INDUSTRIAL BASE OF THE ENTIRE AREA.

I KNOW THAT MY LATE HUSBAND, SENATOR JIM ALLEN, WOULD HAVE APPLAUDED THE JOINT, COOPERATIVE EFFORTS OF THE COMMUNITY, LOCAL OFFICIALS AND THE COMPANY, IN DEVELOPING THE PLANS FOR THE PROJECT. AM FOLLOWING JIM'S LEAD IN FAVORING THE DEVELOPMENT BY URGING YOU AND THE ENVIRONMENTAL PROTECTION AGENCY TO GIVE FAVORABLE CONSIDERATION TO THE PROJECT FOLLOWING THE UBLIC HEARINGS.

SINCERELY YOURS,

MARYON ALLEN, UNITED STATES SENATE

MA/[illegible]

Reproduced from best available copy.

June 26, 1978

Statement of Record
EPA Public Hearing No. PH78AL0018
Ideal Basic Industries, Inc.
Theodore Cement Plant
Gaillard Limestone Quarry

Ladies & Gentlemen and Hearing Panel Members:

I am John C. Thomason, Assistant to the President of Ideal Basic Industries, Inc. and Project Director for the Company's proposed new cement plant in the Theodore Industrial Park and supporting new limestone quarry in Monroe County. As Ideal's designated spokesman for these projects, I would like to read the following statement into the Hearing Record.

In May of 1977, Ideal's Board of Directors approved construction of a 1,500,000 ton-per-year cement plant for the Theodore Industrial Park, near Mobile, and its limestone quarrying operation, adjacent to the Alabama River, in Monroe County. This $175 million commitment followed nearly five years of extensive economic and engineering feasibility studies. Ideal has extensively studied numerous production schemes and manufacturing processes, raw material and fuel sources, transportation alternatives, environmental requirements and other primary and secondary site location criteria. Twenty-seven potential cement plant sites were identified and studied at length in terms of their comparable advantages and disadvantages. A site at Theodore was ultimately chosen by the Company as it provided the best combination of selection criteria.

Production from the new plant will serve an important and rapidly growing economic region - the Gulf Coast, a geographical area in which Ideal has been a major supply source of a basic construction material, considered essential to economic progress, since the late 1940's. It is also an area where the Company's internal supply capabilities have become increasingly inadequate to meet available market demand.

Ideal's plant engineering design is based on the very latest cement manufacturing technology in the world. By utilizing the advanced manufacturing technology of European and Japanese cement producers, combined with sophisticated environmental controls and technical skills from the United States, the new plant will be the first of its kind in the world. While the Project represents a large and technologically advanced undertaking for our company, all processing components represent areas of technical expertise within Ideal.

The benefits of the manufacturing process selected by Ideal are numerous. By design the process is energy efficient, effecting as much as a 40 percent savings over conventional wet process cement manufacturing technology. Both sulfur oxides and nitrogen oxides are substantially reduced and the particulate matter, which in other less technologically and environmentally advanced processes would escape through the plant's stacks, is returned in the process to become a part of the finished product. This has the twofold effect of better utilizing resources while reducing the amount of pollutants which need to be abated. It also means that the plant will produce no process related solid wastes typically associated in the past with the cement manufacturing process. High efficiency filtration units representing Best Available Control Technology will be employed on all air emission points and will comply with all local, state and federal air emission standards. The plant will utilize coal as a fuel source which is in abundant supply and will therefore not deplete dwindling reserves of more restricted energy sources.

It is also important to point out that Ideal's project will not place significant limitations upon future industrial growth in the area.

The manufacturing method selected by Ideal is a dry process not requiring any process water. The main water discharges associated with the plant will be the run off of rain water from area drainage and from stockpiled raw materials, which have been determined by independent biological testing to contain no substances toxic to fish life. Furthermore, water discharged from the immediate plant area will be directed to the inland portion of the new Theodore ship channel and will be of better quality than water conditions now existing in the present Theodore barge canal. Because of the quality of Ideal's water discharges, the project will not tie-in to the proposed Theodore outfall pipeline.

Other treated storm water run off from the site will be directed to the North Fork of the Deer River and will increase the water supply to the adjacent marsh, thus likely enhancing the existing environmental quality of this area. The company plans to preserve virtually all of the marsh in its natural state.

As a consequence of Ideal's commitment to preserve the wetlands area which traverses the property from east to west, Ideal will develop less than 70 acres of its 175 acre Theodore site. A 300 foot wide greenbelt will be maintained along the Dauphin Island Parkway to provide visual and noise protection.

The undeveloped land north of the estuarial area will also act as a buffer. A compatible landscaping program for the plant area is also an integral part of Ideal's development plans.

Although not legally required, Ideal has accepted its environmental responsibility and will reclaim mine-disturbed areas after the quarrying of the limestone. The reclaimed land will be returned to a primary use as pasture, but with greater elevational and vegetative diversity than now exists.

The socio-economic impacts of the Project will bring many benefits to Alabama and the Mobile and Monroeville communities. During the construction phase of these Projects, it is projected that the Theodore labor force will average some 360 persons with a peak of 750 construction workers occurring midway through the 30-month anticipated construction period. A construction payroll of $15 million will accrue to residents of south Alabama since approximately 85 percent of construction employees will be local hires. Another $10 million in materials and service purchases will also occur in the Mobile area during construction. Ideal's Theodore project, during construction, should generate about 1,370 person-years of employment and $30 million of added personal income. Construction will have minimal adverse influences on housing, public facilities and social services because of minimal labor importation.

Once operational, the Theodore plant will employ some 135 persons with an estimated annual payroll of $3 million. Annual purchases in Mobile and south Alabama are projected to exceed $10 million for support services and equipment. The indirect or spin-off benefits from operation are very substantial and EPA has calculated that total employment of Ideal's project in the Mobile SMSA area will be approximately 500 jobs. Over a 20 year period, the new cement plant is projected to generate roughly 5,500 person-years of employment.

Development of the quarry will employ an average of 133 construction workers with a peak labor force of about 250 persons occurring midway through an 18-month construction period. Total construction wages are projected to exceed $3 million. EPA has estimated the multiplier impact of quarry construction employment as generating 60 additional jobs in Monroeville and surrounding counties and $1 million or more in additional personal income.

During operation Ideal's Monroe County quarry will provide jobs for approximately 20 persons generating an average annual payroll in excess of $400,000. Permanent operations at the quarry are ultimately expected to generate a total of 44 new jobs in Monroe County, including some 24 indirect jobs. The isolation of Ideal's quarry site relative to other developed land uses will greatly limit the possibility of off-site impacts upon land use, land value or residential amenity. The quarry operation is not expected to have significant effects on air, water or noise quality.

Ideal's concern for the environment has been manifested at a number of public meetings and question and answer sessions with interested groups and individuals for several years. We appreciate the public input and cooperation generated by these groups and persons during the development of the Project. Even though this public hearing marks a high point of the Environmental Impact Statement process, Ideal will continue its cooperative spirit by maintaining its open posture with the community.

H-9

DAN WILEY, PRESIDENT
ARNOLD DEBROW, MEMBER
BAY HAAS, MEMBER

W. C. HELVESTON
ADMINISTRATOR
DOUGLAS L. MODLING
DEPUTY ADMINISTRATOR

ESTABLISHED 1812

MOBILE COUNTY COMMISSION
POST OFFICE BOX 1443, MOBILE, ALABAMA 36601

June 23, 1978

Mr. John E. Hagan, III, Chief EIS Branch
U. S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, GA 30308

Dear Mr. Hagan:

As Commissioners for Mobile County, it is our pleasure to write this letter in support of Ideal Basic Industries' application for permits to construct a cement plant in the Theodore Industrial Park area.

Mobile County is very happy to have been chosen by Ideal Basic Industries as the site for their expanded production capacity. Since Ideal announced its intention to expand in this area, we have been very pleased with their concern for the environment and their actions as a corporate citizen in our County.

Ideal's concern for a healthy environment is evident in the numerous safeguards that extend from development of the site to the end product, and we are sure that you will find them in compliance with all the regulations for our area.

Mobile County will benefit significantly from the added economic boost, but this letter should not be mistaken as supportive only in the light of anticipated economic benefits. Our endorsement of Ideal Basic Industries' operation is based on their genuine concern for a clean environment.

It is with this in mind that we urge you to award the necessary permits so that construction may begin as soon as possible.

Thank you for your cooperation in this matter.

Sincerely,

Dan Wiley
DAN WILEY, PRESIDENT

Bay Haas
BAY HAAS, MEMBER

H-10

City of Bayou La Batre
J. A. (GUSSIE) WINTZELL, MAYOR
BAYOU LA BATRE, ALABAMA 36509

COUNCILMEN
G. W. ALLENDER
WILLIE LOUISE BRYANT
GERALD L. GOLEMAN
SAUL HEBERT
M. G. TEMME

June 26, 1978

Mr. T. R. Johnson
Ideal Cement Company
576 Azalea Road
Mobile, Alabama

Dear Mr. Johnson:

This is to inform you that the City of Bayou La Batre passed a resolution unanimously endorsing the Ideal Cement Plant in Theodore, Alabama.

Mr. Johnson's presentation to the mayor and council relating the enviromental controls and the socio-economic impact of Ideal Cement led us to believe that Ideal would prove an excellent neighbor.

Therefore, we as a seafood community realizing the importance of environmental control, feel more than satisfied with your extensive plans in conservation.

So on the occasion of June 22, 1978, the City of Bayou La Batre officially endorses the construction of a new 1.4 metric ton per year cement plant at Theodore Industrial Park.

Sincerely,

J. A. Wintzell, Mayor

Statement of G. Thornton Nelson Vice President Alabama Power Company Birmingham, Alabama	Public Hearing on Ideal Basic Industries' planned new Gulf Coast cement plant Municipal Auditorium Mobile, Alabama - June 26, 1978 Environmental Protection Agency Region 4 - Atlanta, Georgia

Gentlemen, my name is G. T. Nelson. I am Vice President of Alabama Power Company and Manager of its Industrial Development Department. It is in this capacity that I appear before you this evening.

For more than 50 years Alabama Power Company has maintained an Industrial Development Department whose principal duty is the creation of jobs for the citizens of Alabama.

I wish to express my appreciation at the opportunity to present this statement concerning the proposed cement plant to be constructed by Ideal Basic Industries as described in the Draft Environmental Impact Statement on this project. I have had the pleasure of working with officials of Ideal Basic Industries for many years. This company has been very successful in providing a much needed product to the public and is well managed by a very ethical management team.

The new cement plant and supplemental limestone quarry will make efficient use of Alabama's abundant natural resources of limestone, clay, and sand. Conversion of these resources into a usable product will provide a valuable boost in the economy of the Mobile and Monroeville areas. The Theodore area has been long identified as an industrial complex and will continue to experience growth, whether or not Ideal Basic Industries is permitted to construct this facility. The question is really to identify the best possible industries to locate within this complex.

The proposed Ideal Basic Industries Manufacturing Plant in Theodore would be the largest facility of its kind ever constructed in a single stage in the United States. The project is the outcome of a five year planning process which included the considerations of twenty seven potential sites as candidate alternatives. Among other considerations, a high premium was placed on the sites with access to deep water. The proposed Theodore ship channel, which is to be built under the auspices of the Corps of Engineers, will provide a 40-foot deep water channel to the plant site. The cement plant will make the best use of this channel as a means of transportation of basic aggregates, as well as finished products.

~~Construction of the two facilities will employ an average of 500 workers for 18/30 months with a local total payroll of $18 million. Also, $10 million will be expended for purchase of construction materials. Approximately 80/85 percent of these workers will be local people.~~

The two projects will ultimately represent a total construction cost of almost $200 million in 1977 dollars, including $20 million for air and water pollution control facilities. When in operation, the combined annual payrolls for direct and indirect personnel will be approximately $8 million in 1977 dollars.

We join with other people in urging that this project be given speedy approval.

E T Nelson

U. S. ENVIRONMENTAL PROTECTION AGENCY
in conjunction with
ALABAMA WATER IMPROVEMENT COMMISSION

Public Hearing

Ideal Basic Industries, Inc.

Mobile, Alabama

June 26, 1978

Statement of James M. Hirs, American National Bank and Trust Company of Mobile:

My name is James M. Hirs and I am Senior Executive Vice President of the American National Bank and Trust Company of Mobile.

Individually and on behalf of the American National Bank, I want to express appreciation for the opportunity to present for the record this statement in support of the NPDES Permit application (EPA904/9-78-005) of Ideal Basic Industries, Inc. to construct and operate a Cement Plant, Theodore Industrial Park, Alabama and Limestone Quarry, Monroe County, Alabama.

First, I would like to state unequivocally that the American National Bank and Trust Company and its officials have been and are strong advocates and supporters of a clean and wholesome environment for our area, the State of Alabama, and our entire nation. This statement can be amply supported and documented by positive actions of the bank through the years. And, for the record, let me state that we are not at this time supporting or advocating any action which, in our judgment, would be detrimental to the quality of our environment in and around either of the locations of the proposed sites in Mobile and Monroe Counties.

We are familar with the areas proposed as sites for the installations of Ideal Basic and we have reviewed the Draft Environmental Impact Statement, Summary Document, and it is our opinion that this request for an NPDES Permit should be granted as requested. The Summary Document indicates that some $20,000,000.00 will be expended for air and water pollution abatement and further that all reasonable steps have been and will be taken by Ideal Basic to provide adequate environmental safeguards. The record further shows that the construction and operations of these two projects in Mobile and Monroe Counties will be a significant factor in the socioeconomic development of this area. This important facet cannot be overlooked and we emphasize again for the record that while we must take adequate steps to protect our environment, it should not and cannot be done to the exclusion of industrial development which is so vital to our citizenry, our county, our state, and our nation.

It is our considered opinion that the proposals of Ideal Basic Industries for the construction of the Cement Plant in Mobile County and Limestone Quarry in Monroe County contain all of the safeguards necessary to protect the environment with respect to water, air and solid waste and we urge the approval and granting of the necessary NPDES and other required permits as expeditiously as possible.

Respectfully submitted,

James M. Hirs

James M. Hirs
Senior Executive Vice President
American National Bank and
Trust Company of Mobile

P. O. Box 831

Phone 205-432-2639

WE SERVE THE PORT FIRST AND LAST

OFFICE OF

MOBILE BAR PILOTS ASSOCIATION
INTERNATIONAL TRADE CENTER
SUITE 131
250 N. WATER STREET

MOBILE, ALABAMA 36601

June 23, 1978

U. S. Enviornmental Protection Agency
Region 4
345 Courtland Street
Atlanta, Georgia 30308

Gentlemen:

We support the construction of the new Ideal Basic Industries plant in the Theodore Industrial Complex.

Ideal Cement, as it was known in Mobile for years, began its operation in the Alabama State Docks area on the west side of Mobile River, within the harbor, shortly after the end of World War II in 1947. They have been an asset to the city, county and State of Alabama in their assistance in promoting a good neighbor attitude within the area industries.

Lets not forget that their finished product, cement, (raw materials for which are obtained in this area) have found its way into the fine highways we enjoy and home and building construction throughout the South Eastern states.

Ideal Basic has employed many people in the Mobile operation since 1947, which in turn helps the retail merchant business. We cannot forget the economic impact this industry has had on the City of Mobile, Mobile County and the State of Alabama in the way of taxes which helps fund many branches of government in this great State of Alabama.

H-13

June 23, 1978
Page Two

Industries such as Ideal Basic help give the area a balanced economy and we see no reason for them not proceeding with their new plant in the Theodore Industrial Complex at the earliest possible date.

Sincerely,

MOBILE BAR PILOTS ASSOCIATION

Douglas J. McColl, President

DJMC:mm

The Merchants National Bank of Mobile

CAPITAL & SURPLUS $20.000.000.00

KEN L. LOTT
PRESIDENT

Mobile, Alabama

P. O. DRAWER 2527
MOBILE, ALABAMA 36622

June 26, 1978

Environmental Protection Agency
Public Hearing
Municipal Auditorium
Mobile, Alabama

Re: Permit Application for
Ideal Basic Industries

Gentlemen:

We have had the opportunity to review the environmental impact statement prepared on the Ideal Basic Industries proposed cement plant for the Theodore Industrial Park in Mobile County and the limestone quarry in Monroe County.

It is our considered opinion that Ideal Basic Industries has developed a plan for constructing and operating the cement plant that meets every requirement and utilizes the best available technology in their process and procedures for controlling impacts to the environment. Of particular note were the many mitigating alternatives which imposed inconvenience and extra cost in some cases to provide the best procedures possible.

We have known this company and their management for many years and have the highest respect for their methods of operation, their integrity and their civic responsibility. We recommend that their permit request be granted.

Sincerely,

Ken L. Lott
President

KLL/mal

H-15

WILSON *Electric Company, Inc.*

ELECTRICAL CONTRACTORS

Industrial · Commercial

479-9431
AREA CODE 205

P. O. BOX 7552
MOBILE, ALA. 36607

June 22, 1978

Mr. John E. Hagan III
Chief E.I.S. Branch
U.S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Ga. 30308

Dear Mr. Hagan:

I am William H. Holland, Vice President, Wilson Electric Company, Inc., and immediate past President of the Mobile Area Chamber of Commerce. I reside on Fowl River and my mailing address is Rt. 1, Box 277A, Theodore, Alabama 36582.

During my two year term as President of the Mobile Area Chamber of Commerce, I worked very closely with Ideal Basic Industries on making their decision to locate their new cement plant. At this time I observed Ideal Basic Industries' keen awareness of protecting the environment and their concern for building environmental safeguards in their plant.

My concern for this new cement plant is two fold; first, the necessity for having an environmental safe plant in our community and secondly, I live in the area of the location of this new plant.

Ideal Basic Industries' plant will have a tremendous economic impact on our area and provide much needed jobs to our area people. I, therefore, strongly urge the U. S. Environmental Protection Agency to issue a permit for this new plant.

Yours very truly,

WILSON ELECTRIC COMPANY, INC.

William H. Holland

William H. Holland
Vice President

WHH/ld

June 26, 1978

Mr. John E. Hagan, III, Chief EIS Branch
U. S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, GA 30308

Dear Mr. Hagan:

The Mobile Area Chamber of Commerce enters this statement for the record in support of the permit applications of Ideal Basic Industries to begin construction of their plant in the Theodore industrial area.

The Chamber has worked closely with Ideal Basic Industries over the past few years, and has been impressed with their endeavors to maintain environmental quality and enhance the communities where they operate. Indicative of this is the participation of Ideal Basic in environmental seminars and symposia, each time indicating a strong adherence to establish regulatory control and environmental standards.

We are centain that upon review of the information submitted by Ideal as part of their Environmental Impact Statement, you will find that their's is a total commitment to the protection, and where possible, improvement of the environment in compliance with State and Federal controls.

Several committees of the Chamber have worked closely with Ideal in helping to bring this corporate citizen to Mobile, and, based upon the above, the Mobile Area Chamber of Commerce requests that EPA grant the necessary permits for Ideal Basic to begin construction at the earliest possible date.

Respectfully,

Ernest W. Todd, Jr.
President

Ernest W. Todd Jr.
PRESIDENT

Mobile Area Chamber of Commerce
P.O Box 2187, Mobile, Alabama 36601, 205 433-6951

H-17

THOMAS B. MARTENSTEIN
PRESIDENT

SMITH·KELLY
SUPPLY COMPANY
S. W. CORNER ROYAL AND CHARLESTON STREETS
PHONE (205) 433-2521 MOBILE, ALABAMA 36601 P. O. BOX 1227

L. M. STRATTON, IV
VICE-PRESIDENT
OPERATIONS

O. E. McDONNELL
VICE-PRESIDENT
SALES

June 26, 1978

United States Environmental Protection Agency
345 Courtland Street
Atlanta, Georgia 30308

Gentlemen:

I am writing with reference to the proposed new cement manufacturing facility and limestone quarry Ideal Basic Industries is to build at Theodore and in Monroe County.

Ideal Basic has been foremost in the cement manufacturing field for many years. Our association with this fine company has been more than satisfactory. Their efforts to provide a superior product in sufficient quantities as well as furnish engineering services to assist in concrete design has contributed to a large extent for our continued use of their product. Quality control and application of the latest engineering concepts to environmental protection has established this firm as a leader in its field.

The continued growth of the gulf south area demands additional supply of cement. Located on the water, bridges, piers, and commercial buildings suit themselves to construction using concrete. Adequate labor market in this area provides additional incentive for placing the plant in Theodore.

I am sure that upon completion of these facilities, Ideal Basic Industries will have constructed one of the most advanced cement manufacturing facilities in existance today. I wholeheartily endorse the construction of this plant.

Sincerely,

T. B. Martenstein
President

cew

WHOLESALE { BUILDING MATERIAL • READY MIXED CONCRETE
CONCRETE BLOCKS • PRE-STRESSED CONCRETE } RETAIL

Associated Industries of Alabama, Inc.

3605 - 8TH AVENUE, SOUTH • BIRMINGHAM, ALABAMA 35222

CHAIRMAN OF THE BOARD
WILLIAM D. BIGGS, President
Chem-Haulers, Inc.
Box 339
Florence, Alabama 35630

PRESIDENT
O. A. MARROW, Plant Manager
Hammermill Paper Group
Riverdale Plant
Box 1409
Selma, Alabama 36701

SENIOR VICE PRESIDENT
J. EDWIN REHM, Senior Vice President
American National Bank and Trust Company
Box 1626
Mobile, Alabama 36629

EXECUTIVE VICE PRESIDENT
GILBERT MOBLEY
Associated Industries of Alabama
Box 31005
Birmingham, Alabama 35222

TREASURER
JAMES E. VANCE, Senior Vice President
The First National Bank of Birmingham
Box 11007
Birmingham, Alabama 35288

VICE PRESIDENTS — BY DISTRICTS

FIRST
N. Q. ADAMS, Senior Vice President
First Naional Bank of Mobile
Box 1467
Mobile, Alabama 36621

SECOND
W. J. HOWARD, JR., President
Standard Electric Machinery Service, Inc.
421 Randolph Street
Montgomery, Alabama 36104

THIRD
CHARLES R. WORBY, Factory Manager
Uniroyal, Inc.
Box 30
Opelika, Alabama 36801

FOURTH
R. R. JOHNSTON, JR., President
The Pro-Lix Companies
Box 423
Aliceville, Alabama 35442

FIFTH
J. WHITFIELD KING, Director
Governmental and Civic Affairs
Southern Region
Monsanto Company
Box 2204
Decatur, Alabama 35601

SIXTH
CHARLES B. WEBB, JR., President
Alabama Metal Industries Corporation
Box 3928
Birmingham, Alabama 35208

SEVENTH
JOHN ALLEN, Plant Manager
B. F. Goodrich Tire Company
Box 1010
Tuscaloosa, Alabama 35401

U. S. Environmental Protection Agency
in Conjunction with
Alabama Water Improvement Commission Public Hearing
Ideal Basic Industries, Inc.
Mobile, Alabama
June 26, 1978

Statement of J. Edwin Rehm
Associated Industries of Alabama, Inc.

My name is J. Edwin Rehm and I am Senior Vice President of Associated Industries of Alabama, Inc.

Individually and on behalf of the Associated Industries of Alabama, I want to express my thanks for the opportunity to present for the record this statement in support of the NPDES permanent application (EPA904/9-78-005) of Ideal Basic Industries, Inc. to construct a limestone quarry in Monroe County, Alabama, plus constructing and operating a cement plant at Theodore Industrial Park, Theodore, Alabama.

Associated Industries of Alabama has always been in the forefront to protect the environment of our state and this region, and its members have in the past spent millions of dollars to protect our air and water resources before any laws were on the books asking them to do so. It should be pointed out that the members of Associated Industries of Alabama tak pride in the fact they actually contribute to the outdoor life of the citizens of Alabama by conforming to and encouraging others to protect the aesthetic values, while providing jobs and economic growth for this area.

After reading the summary document EPA904/9-78-005 the draft environmental impact statement, Ideal Basic Industries, and going over the project description, air quality, noise, solid waste, water resources, the ecology section and the social economics, we feel that the necessary permits should be granted Ideal Basic to start construction forthwith; for the economy of this area needs this production and the other economic benefits that we will derive from this plant and quarry being a realization.

I am sure a industry of the integrity of Ideal Basic will always keep up with the latest innovations and technological advancements that will better aid and protect our environment and I feel certain they will make us a good neighbor, as they have at their plant located at the Alabama State Docks; also as they have in other communities of this nation.

Thank you.

J. Edwin Rehm

J. Edwin Rehm
Senior Vice President

jm

H-19

1st
FIRST NATIONAL BANK
MOBILE ALABAMA

P. O. DRAWER 1467
MOBILE, ALABAMA 36621

W. M. COLLINS
VICE PRESIDENT AND
DIRECTOR OF INDUSTRIAL DEVELOPMENT

AREA CODE 205
438-8351

June 26, 1978

My name is W.M. Collins and I am Vice President and Director of Industrial Development for First National Bank, Mobile, Alabama.

I came here tonight to make a statement in favor of the two (2) projects proposed by Ideal Basic Industries.

I have known Ideal Basic Industries for many years and can attest to the fact that they have been good corporate citizens wherever their plants have been located.

I have been in the Industrial Development field for quite sometime and have never seen a company go to the extent that Ideal Basic Industries has gone in order to protect the environment at a new plant site. This company has truly walked the extra mile in order to ensure the people of Mobile and Monroe counties that they will be an asset to both communities.

I would like to take this opportunity to thank the Environmental Protection Agency for the opportunity of making my views known at this public hearing.

H-20

ALABAMA STATE DOCKS DEPARTMENT
MOBILE

Robert M. Hope
Director

P. O. Box 1588
MOBILE, AL 36601

June 26, 1978

Mr. John E. Hagan, III
Chief, EIS Branch
Environmental Protection Agency
Region IV
345 Courtland Street, N. E.
Atlanta, Georgia 30308

RE: Public Notice No. PH78AL0018
Dated May 26, 1978
Concerning Draft Environmental
Impact Statement
Ideal Basic Industries

Dear Mr. Hagan:

A review has been made of the above referenced Draft Environmental Impact Statement (DEIS) dated May 19, 1978, and the Alabama State Docks Department wishes to go on record in support of this proposed project. The detailed manner with which the DEIS has been prepared supports the State Docks position. Further, the intention expressed in the DEIS to continue to study ways of bringing about reduction in areas which may have reducible, adverse effect is an indication of the thoroughness with which efforts have been and are being made to enhance environmental quality by Ideal Basic Industries.

Over the past months, there have been several meetings by the members of the staffs of Alabama State Docks Department and Ideal Basic Industries to discuss this project, and all of these discussions, both general and technical, further support the State Docks position in requesting approval of this DEIS.

The Alabama State Docks Department requests the approval of this DEIS and issuance at the earliest possible date of National Pollutant Discharge Elimination System Permit and State certification for the construction of the proposed facilities by Ideal Basic Industries at Theodore Industrial Park, Alabama, and Limestone Quarry, Monroe County, Alabama.

Yours very truly,

R. M. Hope

R. M. Hope

RMH/mh

H-21

Pope & Quint

P.O. Box 16546, Mobile, Alabama 36616

☑ 3805 Airport Blvd., Mobile, Alabama 36609 • (205) 344-5520
☐ 4430 Government Blvd., Mobile, Alabama 36609 • (205) 661-9060
☐ 2 North Highway 43, Saraland, Alabama 36571 • (205) 675-7493
☐ 800 Hillcrest Road, Mobile, Alabama 36609 • (205) 343-6400

June 26, 1978

Mr. John E. Hagan, III
Chief, EIS Branch
U. S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30308

Dear Mr. Hagan:

As a concerned member of this community, I wish to make a statement in support of Ideal Basic Industry's application to build a cement plant at the Theodore Industrial Park.

I have been aware of Ideal's plans for several years, and believe this company has taken every reasonable precaution to prevent damage to the environment while providing a badly needed material for continual growth in this area.

The completion of the Tenn-Tom Waterway will have a profound impact on this community and we must be prepared to handle the inevitable growth. Cement and concrete products will play a vital role in this growth, and it is folly to continue delaying the construction of a plant to handle these needs.

Inflation and government regulations have already added millions to the initial estimate of costs, and we all know that these costs must be passed along to the consumer who utilizes the product.

I believe that consideration of the environment by industry has become a recognized fact of life and when good corporate citizens demonstrate their sense of responsibility in these areas, they should receive the fullest cooperation in reaching their goals with an absolute minimum of delay and harrassment.

I sincerely believe Ideal Cement has earned the right to proceed with their plans, and urge the EPA to approve their application without further delay.

Sincerely,

Arthur B. Pope
President

ABP/lsp

COOSA-ALABAMA RIVER IMPROVEMENT ASSOCIATION, inc.

1201 UNION BANK BUILDING
P. O. BOX 32 (205) 265-5744
MONTGOMERY, ALABAMA 36101

ROBERT E. SNETZER
EXECUTIVE VICE-PRESIDENT

OFFICERS

ROBERT F. HENRY
CHAIRMAN OF THE BOARD
MONTGOMERY, ALABAMA

CHRIS B. HEINZ
PRESIDENT
SELMA, ALABAMA

B. H. MOONEY
VICE-PRESIDENT
ROME, GEORGIA

MARY GEORGE WAITE
VICE-PRESIDENT
CENTRE, ALABAMA

W. S. BREWBAKER
SECRETARY-TREASURER
MONTGOMERY, ALABAMA

June 26, 1978

STATEMENT OF THE COOSA-ALABAMA RIVER IMPROVEMENT ASSOCIATION, INC. at the Public Hearing on Ideal Basic Industries new Gulf Coast Cement Plant conducted by the Environmental Protection Agency (EPAP, in Mobile, AL June 26, 1978

Mr. Chairman, my name is Robert E. Snetzer. I am executive vice president of the Coosa-Alabama River Improvement Association, Inc. I reside in Montgomery, Alabama, the location of the headquarters of our Association. I appear at this meeting to express the strong support of our organization for the granting of the necessary permits and approvals for Ideal Basic Industries to construct and operate the new cement plant at Theodore, AL and the Gaillard Quarry in Monroe County, AL. This is the type of development that is of primary interest to our entire river basin stretching from Mobile Bay to Rome, Georgia.

For the past 22 years our Association has worked diligently to have the land-locked central corridor of Alabama up to Northwest, GA opened to the seaport at Mobile for low cost barge transportation. Our goal is partially realized with the opening of the nine foot navigation channel to Montgomery, Alabama. The increased utilization of the now opened portion of our waterway with its resultant economic advantages and the development of commercial navigation on the other half of our waterway, the Coosa River flowing past industrialized Gadsden and on up to Rome, Georgia are the twin objectives of our Association.

The economic development of our river basin to its full potential demands that maximum advantage be taken of available barge transportation on our inland waterway channel. Ideal Industries has adopted a transportation plan that is the most energy conserving and the least environmentally damaging in their plan to barge their limestone the 110 miles from the quarry to the plant.

We have studied the "Draft Environmental Impact Statement, Ideal Basic Industries" EPA 904/9-78-005 and find the proposed construction and treatment completely satisfactory. Our Association recognizes the importance of environmental consideration in planning new developments and do therefore consider Ideals'proposals environmentally sound. We do not think that resources of our river basin can be locked up in unopened quarries or our cities denied new industries to process these resources, if our children and grand children are to have the opportunities that we have had. One of the basic premises of our Association upon its original founding in 1895 was to improve the economic opportunities for the younger generations of Alabamians by creating job opportunities in our river basin. The construction of the Ideals cement plant and quarry is the very type of development we have continuously sought.

We therefore recommend that no further obstacles be placed before Ideal Basic Industries in carrying out at a great financial cost their thoroughly studied and soundly planned installations in Alabama. We request that all necessary permits and approvals be expeditiously granted.

I thank you for this opportunity to appear before you.

JOHN A. ROBERTS, M.A.I.
DAVID D. ROBERTS, C.S.M.

REALTOR®

Roberts
BROTHERS
INC

Realtors

BRANCH OFFICES:
216 McGREGOR AVE., MOBILE, ALA. 36608 – 344-2335
4124 GOVERNMENT BLVD., MOBILE, ALA. 36609 – 661-7321
7051 AIRPORT BLVD., MOBILE, ALA., 36608 – 343-2530
DAPHNE SHOPPING CENTER, DAPHNE, ALA. 36526 – 626-3112
INSURANCE:
3660 DAUPHIN STREET, MOBILE, ALA. 36608 – 343-3100

GENERAL OFFICES:
3664 DAUPHIN STREET, MOBILE, ALA. – 344-9220
MAILING ADDRESS:
P.O. BOX 6217, MOBILE, ALABAMA 36606

H-23

June 26, 1978

Environmental Protection Agency
Mobile, Alabama

Gentlemen:

My name is Albert J. Meacham and I am Executive Vice President and General Manager of Roberts Brothers, Inc. I am also President of the Mobile County Board of Realtors, however, the statement which I make below is not intended to represent the position of that organization.

I am in favor of the immediate permitting of plant construction of Ideal's Theodore Cement plant for the following reasons:

1. It is my understanding that Ideal has met every standard imposed by State and Federal Agencies relating to environmental safeguards.
2. Cement is in short supply in other parts of the country and could possibly become so in Mobile if permission to build this plant is denied.
3. Construction of the plant should result in economic benefits to the City of Mobile in the form of additional employment and a stable cement supply. It should also have a positive effect on housing construction.
4. Ideal has already proved itself to be a good citizen of the community having been in operation here since 1947. During that time the company has been actively involved in many worthwhile civic projects including the United Fund, the Mobile Baptist College and the Chamber of Commerce. In view of Ideal's past record, it is reasonable to assume that the company will continue to operate responsibly and intelligently in its relationship with the Mobile community.

Respectfully submitted,

Albert J. Meacham

Albert J. Meacham
Executive Vice President

H-24

STATEMENT MADE ON BEHALF OF IDEAL CEMENT COMPANY AT ~~CORPS OF ENGINEERS~~' HEARING

JUNE 26, 1978 US ENVIRONMENTAL PROTECTION Agcy

I am Ezra Trice, Executive Vice President of Southern Industries Corporation. I am here to make a statement in favor of Ideal Cement Company's proposal to construct a new cement manufacturing plant on the Theodore Channel.

Southern Industries has been associated with Ideal Cement Company since Ideal first began operating in Mobile in 1946. We have been their major supplier of raw material. If it had not been for Ideal, I doubt that Southern Industries would even exist today--but let me say here that Ideal's new plant will not use shell as a raw material and we will not be a supplier so that does not motivate my statement.

I personally have been associated with Ideal and its management for 30 years. I do not know of any company or management group that I have a higher regard for. Ideal has been an excellent industry for Mobile. It has provided employment for many families and it has furnished Mobile and this area a basic construction product at the lowest possible price. It has always met its responsibilities in the community and its employees have always been active in civic activities.

The cement industry is having a difficult time meeting the present demands for cement in this area and throughout the South. Unless production capacity is increased, the industry will not be able to supply the market adequately in a few years. To meet this increasing demand and to remain competitive, Ideal must replace an old mill with a modern facility.

I think Mobile is very fortunate in being chosen for this location. This area will be assured an adequate supply of cement at the lowest possible price.

The plant will meet all environmental standards that have been established and it will provide employment for over 200 Mobile families. Employment will be provided for many more during its construction.

All of its studies have been completed and submitted to the necessary environmental agencies. I strongly urge that this Permit be issued in order that this project can proceed as soon as possible.

H-25

TILLMANS CORNER CHAMBER OF COMMERCE
6337 HIGHWAY 90 WEST
MOBILE, ALABAMA 36619

CHARLES PRATER
PRESIDENT

THOMAS HARRIS
VICE-PRESIDENT

BRENDA SMITH
SECRETARY

FRED PRICKETT
TREASURER

June 26, 1978

Environmental Protection Agency

Municipal Auditorium, Mobile, Alabama

Re: Public Hearings on Ideal Basic Industries

Mr. Chairman:

On behalf of the Tillmans Corner Chamber of Commerce, I W.C. Prater, President, would like to make the following statement and ask same to be entered into the official minutes and records of this meeting in favor of granting the necessary permits for construction of the cement plant in the Theodore Industrial Park.

The Tillmans Corner Area Chamber composed of approximately (40) forty different businesses in the Tillmans Corner and Theodore Area, was organized for the purpose of improving and promoting the area. As business owners and residents in the area, we are very much interested in what types of industries locate in the area, and what effect they will have on our environment and the safe guards which will be taken to maintain an acceptable environment for the community in the future.

We believe that Ideal Basics Industries will be an asset to our area by providing additional jobs, and will take the necessary safeguards to protect our environment as discussed at length in the EPA'S Draft Environmental Act Statement on the Project, dated May 19. We sincerely request that the necessary permits be granted so that Ideal Basics Industries can begin construction and become a part of our community.

Yours truly,

W C Prater

W.C. Prater
President

June 26, 1978

United States Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30308

RE: EPA 904/9-78-005
NPDES Application Number: AL0028801, Cement Plant

APPLICANT: Ideal Basic Industries, Inc.

WORK: Construction and operation of a cement plant in the Theodore Industrial Park

---

My name is Debbie Howard and as a resident of Dog River, a life-long citizen of Mobile, and more importantly, a mother, I would like to express my full support of the proposed Ideal Basic Industries' cement plant at the Theodore Industrial Park.

Ideal Basic Industries not only has taken every step available to insure the environmentally safe operation of their proposed plant, they have gone "beyond the call of duty" by seeking the ideas, opinions, and views of the citizens of Mobile. I feel that when a company takes this approach (not to mention the expense) we must all stop and look at the situation realistically...not to close our minds to the fact that because a new industry is going to build here, it will automatically pollute the air and water. We lose our sense of perspective when we automatically equate new industry with new problems. How much better if we dealt with the problems and took a closer, more realistic view of the opportunities.

When we can have our cake and eat it too, why not take it? Not only will the plant boost the economy in the Mobile area (and with inflation and unemployment at the peak it is now, this factor MUST be given significant importance) Ideal is using every measure available to insure the environmentally safe operation of the plant (not to mention all the costly energy savings techniques.

I often-times wonder in many citizen-oriented attempts to insure a pollutant-free environment, the objectives have transversed the thin line from being pro-environment to one of basically being anti-industry.

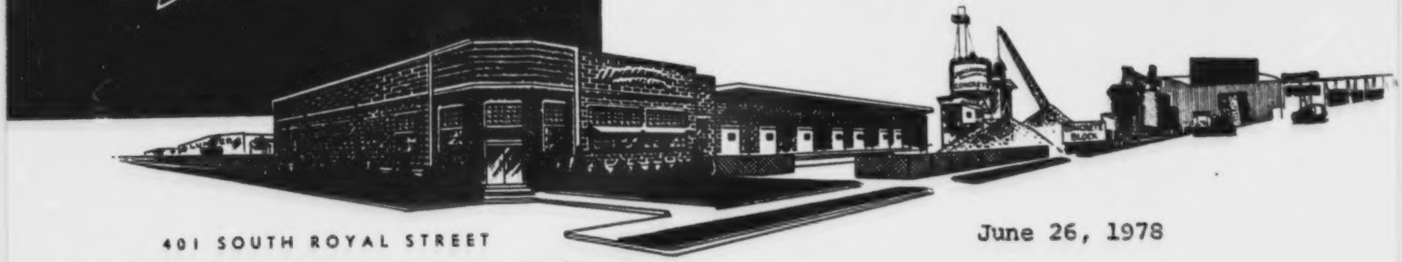
I fully support Ideal Basic Industries' prposed cement plant to be located in the Theodore Industrial Park.

Debra R. Howard
Debra R. Howard
3116 Newton Drive
Mobile, Alabama 36605

UNDERWOOD
BUILDERS SUPPLY CO.

H-27

B. W. MILLING, PRESIDENT
J. F. CRANE, EXECUTIVE V.P., OPERATIONS
M. W. MYERS, EXECUTIVE V.P., MARKETING
C. B. LORD, V. P., MASONRY DIVISION
R. J. MILLING JR., V.P., PURCHASING
LOUISE T. MYERS, SECRETARY



401 SOUTH ROYAL STREET
P. O. BOX 1587 • MOBILE, ALABAMA 36601

June 26, 1978

U.S. Environmental Protection Agency
Region #4
345 Courtland Street
Atlanta, Ga. 30308

Reference: Ideal Basic Industry
Theodore Cement Plant

Gentlemen:

My name is Bert W. Milling, President of Underwood Builders Supply Co., Inc. Mobile, Ala.

I speak in support of Ideal Basic Industries' application for permit to construct a cement manufacturing plant in the Theodore Industrial Complex.

In 1947 Ideal activated a stand-by aluminum plant built by the U.S. Government for our protection during World War II. This move provided a local supply of a critically short basic building material, cement, took up the slack in lost jobs from the winding down war effort, and gave Mobile another stable industry.

From that date Ideal Basic has become an integral part of our community, supporting our Churches, Schools, United Fund, Civic Clubs, Historic Mobile Groups, Chamber of Commerce; in fact every facet of our city and area.

They have never wavered from their initial commitment to supply our city's need for the most basic of building materials, Portland Cement. While other areas of our country were forced to postpone needed construction for lack of cement, our town has not had this problem because of this firms integrity and resolve to keep their commitment to keep us supplied.

Rising costs, inflation and changing technology now make it imperative that they upgrade and increase their production facilities in order to maintain a constant and competitive supply to this market of this critical building material.

Years of personal contact have shown me that this is a great firm, sensitive to a communities every need, including environmental requirements.

They should be permitted to construct this new facility in order that the Mobile area may continue to benefit from the tremendous contribution they make to us.

Sincerely,

UNDERWOOD BUILDERS SUPPLY COMPANY

Bert W. Milling, President

BWM/bam

H-28

STATEMENT BY SHELDON L. MORGAN, PRESIDENT OF THE WARRIOR-TOMBIGBEE DEVELOPMENT ASSOCIATION TO THE ENVIRONMENTAL PROTECTION AGENCY, MUNICIPAL AUDITORIUM, MOBILE, ALABAMA, June 26, 1978

We have followed the plans of Ideal Basic Industries since their initial investigation for constructing the proposed cement plant at the Theodore Industrial Park. Our first contact with them in this regard was in 1973. We have continued to work with them during the planning of the project and have been impressed with the minute detail they have given to each element of the plan. More particularly, we have seen the company exert a comprehensive effort in meeting the necessities to provide the least possible impact to the environment. The environmental impact statement which we have read substantiates in detail their planned efforts to maintain environmental quality.

As President of the Warrior-Tombigbee Development Association and Chairman of the Port & Waterways Committee of the Mobile Area Chamber of Commerce, I have had the opportunity of working to obtain a deep water channel into the Theodore Industrial Park. This has given me an opportunity to become very familiar with Ideal Basic and its management. I have the greatest respect for the company and its people. It is my opinion that the project will provide considerable impact to the Mobile economy with the purchase of materials and construction of the plant, as well as employment of hundreds of construction workers. This comes at a time when construction work on some of our major projects is coming to a close and it will help carry on the level of construction activity we have enjoyed in the Mobile area over the past few years.

We favor construction of the plant and recommend that the Environmental Protection Agency issue the necessary permits for which Ideal Basic Industries has applied.

Signed:
Sheldon L. Morgan

MBR

Mid-Gulf Business Roundtable

3100 Cottage Hill Road, Suite 409
Bel Air Office Mall II
Mobile, Alabama 36606
(205) 476-6787

June 26, 1978

The Mid-Gulf Business Roundtable is a non-profit association of major construction users in the Mobile Mid-Gulf area; it is concerned with maintaining a healthy construction climate for industrial growth balanced with proper environmental control measures.

Members of the association have been polled and unanimously support Ideal Basic Industries planned new gulf coast cement plant project. We believe Ideal's acceptance of their environmental responsibility on this project is demonstrated by the extensive control measures to be incorporated into their process as outlined in EPA's Draft Environmental Impact Statement.

Ideal has been a long time member of the Mobile Industrial community. They have proven themselves to be a respectable company; their construction and operation of this proposed large modern cement plant will be an outstanding addition to the industrial expansion in this area.

Ralph E. Whitson

Ralph E. Whitson
Executive Director

REW:mls

INDUSTRIAL DEVELOPMENT BOARD OF THE CITY OF MOBILE
MOBILE, ALABAMA

REPLY TO:
P. O. BOX 2187

June 26, 1978

John E. Hagan, III, Chief EIS Branch
Environmental Protection Agency
Region IV
345 Courtland Street, N. E.
Atlanta, GA 30308

Dear Mr. Hagan:

Pursuant to the joint public notice soliciting comment on the Draft Environmental Impact Statement, on the proposed issuance of NPDES permit and on consideration for State certification of discharges, all in connection with the proposed facilities of Ideal Basic Industris, Inc. to be constructed and installed as a cement plant in the Theodore Industrial Park, near Mobile, Alabama and as a quarry on the Gaillard Tract, near Monroeville, in Monroe County, Alabama, The Industrial Development Board of the City of Mobile has requested that a statement be submitted at the public meeting and also be submitted in writing.

The statement is as follows:

"The Industrial Development Board of the City of Mobile, Alabama, a public corporation under the laws of the State of Alabama (the "Board"), with its geographical area of operation located in the environs of the City of Mobile and southwest Alabama, is presently a property owner in what is known as the Theodore Industrial Park located approximately four miles south of the City. The Industrial Board obtained the property in Theodore in 1965 and has been extremely interested in the development of the Theodore Industrial Park since that time. The development of industry in Theodore was and is a project of concern to the Board and to the Mobile area Chamber of Commerce from which the first impetus for the formation of the Board came. Since 1973, the Board, the State of Alabama, and various municipal and county governing bodies and organizations have done yeoman work in order to provide the necessary incentives and assistance required by the complex and continuously required effort to encourage economic and industrial development for the benefit of the citizens of the Mobile area and the State of Alabama. Beginning in 1974, the Board has maintained a close liaison with development personnel from Ideal Basic Industries, Inc. (the "Company") regarding, primarily, the development of the Theodore Cement plant proposed at that time and, secondarily, regarding the quarry site located near Monroeville.

The property owners in the Theodore Industrial Park area have been in the forefront of encouraging the project proposed by Ideal, and the Industrial Board has acted as a sounding board and counsellor to the Company regarding the myriad of complex problems confronting such a large undertaking as the installation of the proposed plant. The Board has consistently reviewed matters submitted by the Company as it progressed to the point at which we are today. The Board has been provided with a copy of the DEIS prepared by the EPA for the Theodore plant and the Gaillard quarry containing approximately 1,070 material pages. The Appendices Volumes I through IV to the Draft Statement have described, categorized, qualified, examined, studied, and scrutinized various areas of inquiries necessary to develop a complete and proper Environmental Impact Statement and have addressed in depth and detail each area of inquiry in consummately appropriate fashion.

The extremely detailed information contained in the various Appendices, in the estimation of the Board, represent findings which substantiate the impacts noted in the Summary Sheet for the Draft Environmental Impact Statement, all of which, when taken as a whole, develop a project which has a generally low to moderate magnitude and significance upon the various areas reviewed. Significantly, the operation of the cement plant has been determined by EPA to be of such a nature as would not cause a violation of the applicable air quality standards and that the discharges from wastewater, storage pile runoff, cooling tower blowdown, washwater and storm water runoff have been preliminarily determined by EPA to comply with applicable water quality standards. It is pointed out in the Summary that solid waste will be appropriately deposited in state-permitted landfills and that the noise impact will be within an acceptable bound.

It is further pointed out that the economy of both the Mobile area and the Monroe County area will receive beneficial economic stimulous and impacts from the operations of the plant and the quarry, which impacts, contrary to those above mentioned, will be of moderate to high magnitude and of moderate significance. The Board also considers it extremely significant that the good offices and critical comments of so many agencies and groups have been solicited in order to develop a well rounded public approach to the Impact Statement. It is significant that 18 federal agencies, 7 state agencies, 5 local agencies, 22 interested groups and individuals and 19 state and governmental officials have been contacted in this regard. Without question, the Industrial Board has no reservation about its public stand and support of the project being undertaken by Ideal Basic Industries. The betterment of the community and the public purposes for which the Industrial Board was founded will be greatly enhanced by this large cement plant operating in the Theodore Industrial area, adding jobs, security, and a greatly increased payroll to the economic community of the Mobile area and therefore, to the betterment of those living in, and owning property in, the Theodore Park area. It goes without saying that to be chosen as the site of such a facility from among 27 competitors speaks well for the community and the natural resources available in Mobile. Certainly intelligent and wise development of the natural resources of our community will benefit each member of the community in one way or the other, but discretion is the watch word which must be observed in order to provide orderly development consistent with a better way of life - economically, socially and ecologically - for all of our people.

An undertaking of the dimension proposed by Ideal can but have tremendous significance to the community because it touches practically every worker in the area by creating a demand for more services and by creating a demand for better services. The Board has watched this project develop and has watched its impact on the development of the community and is convinced that this project will greatly affect the life blood of the Mobile area, which is the Port of Mobile. The historic development of southwest Alabama is, and has been, inextricably tied to waterborne commerce and the projected increase of such tonnage necessary to meet the requirements of Ideal's Theodore cement plant are an enhancement which alone would justify a commitment to this development. However, it is in the interests of the general good of all that all relevant considerations be examined with the care and caution, as have been apparently devoted to the development of the

Draft Environmental Impact Statement presented by EPA for Ideal Basic Industries projects. The findings proposed in this draft clearly expose no significant detriment to our community, and in fact, exhibit the numerous benefits which are available to industries such as Ideal. The Board urges that all comments be quickly collated and absorbed to their best purpose and that a speedy determination of the procedures be made so that this matter may not be unnecessarily delayed any longer. The Board asks that its comments herein contained be spread upon the minutes of the Public Hearing held June 26, 1978."

THE INDUSTRIAL DEVELOPMENT BOARD
OF THE CITY OF MOBILE

By E. Frank Schmidt
E. Frank Schmidt
President of the Board of
Directors

H-31

Peter M. Kenyon
PRESIDENT

Matt Hayze Perkins
1ST VICE PRESIDENT

John E. Bertolotti
2ND VICE PRESIDENT

Mobile Traffic & Transportation Club
POST OFFICE BOX 408 MOBILE, ALABAMA 36601

J. I. Gillikin
SECRETARY - TREASURER

June 22, 1978

Environmental Protection Agency
Mobile Municipal Auditorium
Mobile, Alabama

Gentlemen:

The Mobile Traffic and Transportation Club is composed of members representing business and industry in the Mobile area, primarily those affected by the transportation sector of our economy. All modes are represented. The Club was established in 1940 and has a membership of over 460.

We have followed with interest the developments pertaining to the Ideal Basic Industries proposed plant facility in the Theodore Industrial Park and their quarry on the Alabama River in Monroe County. We have noted further that the project relies heavily on the transportation industry to maintain their operations, both for inbound raw materials and outbound finished products. Knowing the economic benefits derived from transportation services in the local economy and having studied the plans for the Ideal Basic Industries facilities, we feel confident that the granting of the permits to Ideal would not only be in the best interest of a fine company, but would benefit the local economy by providing jobs and services.

We would like to recommend the granting of the permits in question.

Sincerely,

Peter M. Kenyon
President

PMK/caw

H-32

THE PROPELLER CLUB
OF THE UNITED STATES • PORT OF MOBILE
P. O. BOX 1631 ZIP CODE 36601

June 26, 1978

Environmental Protection Agency
Mobile Municipal Auditorium
Mobile, Alabama

Gentlemen:

The Propeller Club of the United States, Mobile Chapter, has a vital interest in marine transportation and of its corollary activities. It is primarily interested in the transportation system of this country as it pertains to the role of the American Flag carriers. The case of Ideal Basic Industries is one that we heartily support, as they plan to establish a manufacturing facility in the Theodore Industrial Park, as well as quarrying operations in Monroe County. Ideal Basic Industries has supported the American merchant marine and has been active in marine operations for many years. We know them to be a company of high integrity and recommend favorable action on their permit request.

Sincerely,

Hartwell

Hartwell Ludlow
President

HL/caw

"American Merchant Marine For World Trade"

Monroeville Area
Chamber of Commerce

Old Courthouse
P. O. Box 214
Monroeville, AL 36460
Phone (205) 743-2879

June 23, 1978

U. S. Environmental Protection Agency
Attention: Ms. Mona Ellison
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Gentlemen:

On behalf of The Monroeville Area Chamber of Commerce, I would like to submit the following statement relative to the proposed construction and operation of the Gaillard Quarry in Monroe County by Ideal Basic Industries.

Based on the information available to us, we feel that the environmental impact of the operation of Gaillard Quarry by Ideal Basic Industries will be of minimal significance. The construction phase and subsequent operation of this facility should result in social and economic benefits to the Monroeville Area. We welcome this industry without hesitation and look forward to having them in our area.

Thank you for this opportunity to express our opinion. Your consideration will be appreciated.

Sincerely,

Cren Pritchett

Cren Pritchett
President
Monroeville Area Chamber of Commerce

CCP/so

"The Hub of Southwest Alabama"

MONROE COUNTY COMMISSION

Monroe County
JUDGE OTHA LEE BIGGS, President
Monroeville, Alabama 36460

ALLEN BIGGS
Acting County Engineer

MEMBERS

JERALD R. JORDAN
Place 1, District 1

WALTER L. AGEE
Place 2, District 2

ANNA RUTH MELTON
Clerk

MEMBERS

F.P. WILLIAMS
Place 3, District 1

F.S. STEELE
Place 4, District 2

DR. W.H. HINES
Purchasing Agent

June 26, 1978

The U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N. E.
Atlanta, Georgia 30308

Re: EPA 904/9-78-005
NPDES Application Numbers:
AL0028819, Limestone Quarry
Applicant: Ideal Basic Industries, Inc
Work: Construction and Operation of the Limestone Quarry, Monroe County, Alabama

Gentlemen:

The Monroe County Commission of Monroe County, Alabama, in view of the environmental safeguards and measures being undertaken by Ideal Basic Industries, Inc., to avoid adverse or detrimental impacts from construction and operation of the Limestone Quarry in Monroe County; in view of the efforts being taken by Ideal Basic Industries, Inc., to protect the surrounding area to the Quarry site; and, in view of the substantial economic benefits to be derived in Monroe County and the neighboring counties from operation of the project, we wish to enter this statement of support for the construction and operation of the project.

We also wish to express our sincere appreciation to Ideal Basic Industries, Inc., for the attitude they have shown in coming into our community particularly their complete openess and early communication with the community. It is respectfully requested that approval be given for the construction and operation of this project.

Respectfully submitted,

MONROE COUNTY COMMISSION
MONROE COUNTY, ALABAMA

By Otha Lee Biggs
President

WILLIAMS DRUG STORE
PRESCRIPTION SPECIALISTS
P. O. Box 250
MONROEVILLE, ALABAMA 36460

June 26, 1978

The U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N. E.
Atlanta, Georgia 30308

Re: EPA 904/9-78-005
NPDES Application Numbers:
AL0028819, Limestone Quarry
Applicant: Ideal Basic Industries, In
Work: Construction and Operation of the Limestone Quarry, Monroe County, Alabama

Gentlemen:

As a member of the National Wildlife Federation, Alabama delegate to the National Wildlife Federation and a member of the Monroe County Conservation Club, I respectfully submit this statement of support to the construction and operation of the Limestone Quarry in Monroe County, Alabama, as proposed by Ideal Basic Industries, Inc. This statement of support is given in view of the environmental safeguards and measures being undertaken by Ideal Basic Industries, Inc., to avoid adverse or detrimental impacts from the construction and operation of the Limestone Quarry.

As an avid sportsman and conservationist of our wildlife and natural resources, I am convinced that the construction and operation of this project will not have adverse or detrimental impacts on our environment. I respectfully request that approval be given to the construction and operation of this project.

Respectfully,
R. B. Williams III
R. B. Williams, III

H-36

MONROE COUNTY CONSERVATION CLUB

P. O. BOX 250 — TELEPHONE 743-3107
MONROEVILLE, ALABAMA 36460

June 26, 1978

The U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N. E.
Atlanta, Georgia 30308

Re: EPA 904/9-78-005
NPDES Application Numbers:
AL0028819, Limestone Quarry
Applicant: Ideal Basic Industries, Inc.
Work: Construction and Operation of
the Limestone Quarry, Monroe
County, Alabama

Gentlemen:

As President of the Monroe County Conservation Club, Monroe County, Alabama, I respectfully submit on behalf of the Monroe County Conservation Club a letter of support for the construction and operation of the above referenced project. It is our opinion that Ideal Basic Industries, Inc., is taking the necessary environmental safeguards and measures to properly protect our environment against adverse or detrimental impacts.

We respectfully request that approval be given to the construction and operation of the Limestone Quarry in Monroe County, Alabama.

Yours truly,

Johnny Snyder

Johnny Snyder, President
Monroe County Conservation Club
Monroe County, Alabama

STATE OF ALABAMA
COUNTY OF MOBILE

CERTIFIED COPY OF RESOLUTION OF MOBILE COUNTY WILDLIFE AND CONSERVATION ASSOCIATION

At a meeting of the Board of Directors of Mobile County Wildlife and Conservation Association duly called and held on June 22nd, 1978 at Korbet's Restaurant at 5:30 P. M. to consider, amongst other things, the Environmental Impact Statement of Ideal Basic Industries covering its proposed construction of a cement plant at the Theodore Industrial Park in Mobile County, Alabama, the following proceedings were had and resolutions passed:

Ideal Basic Industries made a presentation to Mobile County Wildlife and Conservation Association covering its Environmental Impact Statement and Plans for construction of a cement plant at the Theodore Industrial Park. Questions from the floor were invited and discussions of various portions of the proposed plans and their expected impact from the environment were held. The spokesmen for Ideal Basic Industries were then requested to leave the meeting while the directors of Mobile County Wildlife and Conservation Association discussed the matter. On Motion duly MADE and SECONDED, the following resolution was adopted:

BE IT RESOLVED that Mobile County Wildlife and Conservation Assocation go on record as giving affirmative approval to the proposed plans of Ideal Basic Industries for construction of its plant at Theodore Industrial Park in Mobile County, Alabama, as described in its Environmental Impact Statement.

On vote, the above resolution passed unanimously. A motion was then made from the floor that the records of Mobile County Wildlife and Conservation Association reflect that the vote on this issue was unanimous and it was so ordered.

Other business before the meeting did not concern this issue.

I hereby CERTIFY that the above resolution has not been repealed or amended.

Frederick Cushing Jr.

FREDERICK CUSHING, JR., PRESIDENT

June 26, 1978

H-38

June 26, 1978

United States Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30308

RE: EPA 904/9-78-005
NPDES Application Number: A10028801, Cement Plant

APPLICANT: Ideal Basic Industries, Inc.

WORK: Construction and operation of a cement plant in the Theodore Industrial Park

---

My name is Jean King and I appear before you as an interested private citizen. I am neither a self-appointed environmental expert nor a self-annointed economic Einstein and must depend on my technical expertise within these particular areas to those within this community whose formal and information education makes them a qualified evaluator of such matters.

My vantage point is basically two fold - that of a private citizen and that of one whose profession has involved them in working with consumer groups and consumer legislation at the state and national levels for over 10 years. In view of the total openness and honesty of Ideal Basic Industries in locating a plant here and in recognition of the significant and costly actions taken by this company to insure this community and its citizens that the environmental impact is of low and moderate significance, I wish to enter my statement of strong support for this project.

I have been most impressed with this company's eager willingness to work within the community and to not only seek, but most importantly, to incorporate the ideas and opinions and recommendations of diverse groups within the community into its plans. Certainly, this company's genuine sincerity and most expensive exercise to insure safety is a credit not only to Ideal, but to this community and its environmental groups for it signifies that industry working together with a community can achieve a position equitable to all - economically and environmentally.

As a mother of two children, I am keenly aware that choice I make today must not challenge the capabilities of my own children to survive not only economically, but so very important today, survive environmentally. We hold the responsibility of making choices that will provide a Mobile that is both environmentally safe and economically secure. Ideal Basic Industries through its efforts has convinced me that they too seek this same objective. They have made the choice of accepting the responsibility of doing what is right by this community. There is not much more than we can demand of an industry - if we are truly logical, if we are truly realistic and certainly no industry has ever demanded more of itself in Mobile, Alabama than has Ideal Basic Industries.

Ideal Basic Industries has truly exhibited a corporate capability of cooperative teamwork at the community level.

Jean D. King
Jean D. King
3628 Heritage Drive North
Mobile, Alabama 36609

Sheridan Construction Corp.

CONTRACTORS & HOME BUILDERS

504 HOLCOMBE AVE., P. O. BOX 6231
MOBILE, ALABAMA 36606
478-5200

June 26, 1978

U. S. Environmental Agency
Region 4, 345 Courtland St.
Atlanta, Ga. 30308

Gentlemen:

My name is Morris L. Sheridan of 31 Ashley Drive, Mobile, Ala. I am President of The Home Builders Association of Metropolitan Mobile, Inc., and President of Sheridan Construction Corporation.

I compliment and support Ideal Basic Industries, Cement Division, in their decision to construct a new Portland Cement plant at Theodore Industrial Park.

As President of The Home Builders, I know the importance of portland cement as it is one of the basic construction material used in nearly all houses and other residential construction such as driveways, sidewalks, curbs, streets, etc. The construction of a new cement plant by Ideal Basic Industries would insure a continuing and low cost supply of this basic building material.

We are also interested in the additional employment that will be provided by the construction of this plant and the additional support employment that occurs when new plant facilities are constructed. All this means more houses, schools, shopping centers and the like construction for building contractors and all their suppliers.

I am familiar with Ideal's personnel and their involvement in our local community life. They are very active in our organization, Chamber of Commerce, United Fund, just to name a few. This involvement has been steady since Ideal began operations here in 1947.

They have produced quality cement products meeting all existing specification for the local markets during this period and are well respected as a leader in their industry for this same high quality. The proposed new plant will insure our industry of the highest quality products for the bright future of our local area.

In summary, we highly support Ideal Basic Industries efforts to construct a new modern portland cement facility in the Theodore Industrial Park to serve the growing future of home building in this area.

Sincerely,

Morris L. Sheridan

Morris L. Sheridan

L&N

LOUISVILLE & NASHVILLE RAILROAD COMPANY

908 West Broadway
Louisville, Kentucky 40201

June 24, 1978

Environmental Protection Agency
Municipal Auditorium
Mobile, Alabama

Re: Ideal Basic Industries

Gentlemen:

Plans on the part of Ideal Basic Industries to construct a cement plant in the Theodore Industrial Park, Theodore, Alabama, have been known to us for approximately four years. They have reviewed with us their needs for rail transportation and this has given us an opportunity to get to know the company and its management. We are very impressed with their integrity and sincerity and have reason to believe that they have made every effort possible to implement the most modern procedures available for the protection of the environment, both during construction as well as subsequent operation.

It is our opinion that the economic benefits to be derived by the construction and operation of the facility will more than offset any impact that might be made otherwise and it is our considered opinion that the permit should be granted in order to initiate construction and operation of the facility.

Sincerely,

K. C. Dufford

K. C. Dufford, VP-Operations
Louisville & Nashville Railroad Company
Louisville, Kentucky

June 26, 1978

H-41

Environmental Protection Agency
Mobile Municipal Auditorium

My name is Marisa Gardner, Health and Environment Chairman of the Mobile Community Organization.

Ladies and Gentlemen - Although I am favorably impressed with the Draft Environmental Impact Statement and with the concern shown by Ideal Basic Cement Company I feel I must point out ~~these~~ ideas for your benefit so that should permission to build in the Theodore Industrial Park be given - you could say you were told of possible problems.

In a letter to the Editor printed on February 2nd, 1978 I stated that the good people of Ideal Cement have a beautiful plan to build a plant however I have my doubts as to Theodore being the right spot. I am still of the same opinion.

Borrowing from battleground terminology, two Norwegian meteorologists while seeking new terminology for movements of masses of air named the point where two air masses met and clashed the "front."

As most of you know the atmosphere is a mixture of gasses that are highly elastic and easily set in motion. On a calm, sunny day the atmosphere seems to be nonexistent, but it becomes visible and destructive when its cargo of water vapor is condensed in the form of racing storm clouds.

Both sea breeze and land breeze circulations contribute to the ventilation and dispersion of emitted material. Sea and land breezes can be brought about by synoptic-scale weather pattern such as highs, lows, or frontal systems, but it is more appropriate to discuss the smaller scale phenomena which take the form of true vertical circulations over most coastal areas.

Mesoscale influences affecting Mobile increase greatly in the summer season. Sea breezes created by very localized temperature and density gradients are established along the coastline because of the much greater heat capacity of the sea as opposed to the land. The cooler sea air is denser and sinks, while the hotter land air rises.

While mesoscale breezes help cleanse the air through dilution of emitted material, several situations have been observed where emitted material, once caught in a sea breeze, has been recirculated toward its point of release.

Modern technology with its high-speed computers is of little use in most of man's direct confrontations with the weather. We can predict it, but we we cannot govern it.

The old saying has been 'everybody talks about the weather but not one can do anything about it.'

I believe the time has come for everyone to realize that major changes are needed so that in the future cities will have to be planned scientifically to help control microweather so that life can be more pleasant. Hundreds of acres of pavement and masonry absorbing and holding heat do effect local weather conditions. When these changes are combined with quantities of industrial pollution, the results could be devastating.

There were 20 reports of tornadoes in the vicinity of Mobile over a 13 year period according to Paulz. (1969) I predict we will see an increase in the number of storms in the Mobile area.

Should Ideal Cement receive a permit to build on the site requested it is predicated that using alternative #1 - 173 tons of particulates will be released by point 45 and the same for point 46. Should alternative #2 be used there would be the same emission for particulate, however other companents such as Sulfur Dioxide would go from 3013 tons per year for emission point 45 and 46 to 3348 tons per year for alternative #2. Other components would also be in the higher amount for alternative #2.

Again I have nothing against cement - this is not a personal problem - it is an expression of how to reach the best conclusion for the Mobile area. We have so much to be thankful for and probably we are not aware of the true potential for Mobile.

Sincerely,

Mrs. Marisa Gardner

Mrs. Marisa Gardner
111 Idlewood Dr.
Chickasaw, AL. 36611

H-42

SOUTH ALABAMA
REGIONAL PLANNING COMMISSION

INTERNATIONAL TRADE CENTER
250 N. WATER STREET

MAILING ADDRESS
P. O. BOX 1665
MOBILE, ALABAMA 36601

MAIN OFFICE (205) 433-6541
AREA AGENCY ON AGING
(205) 433-7417

RICHARD D. PRUITT
EXECUTIVE DIRECTOR

NORMAN J. WALTON, CHAIRMAN
NEIL LAUDER, GENERAL VICE-CHAIRMAN
J. C. DAVIS, JR., PROJECT REVIEW VICE-CHAIRMAN
W. M. McGOUGH, SECRETARY
MARTIN POWELL, TREASURER

STATEMENT FOR THE RECORD
Submitted by the South Alabama Regional Planning Commission
Public Hearing
Monday, June 26, 1978
Mobile Municipal Auditorium
Mobile, Alabama

Subject: DRAFT ENVIRONMENTAL IMPACT STATEMENT - IDEAL BASIC INDUSTRIES

I am Norman J. Walton, Chairman of the South Alabama Regional Planning Commission with offices located in the International Trade Center in Mobile, Alabama.

As the designated 208 agency and the agency with regional responsibility for land use, housing, transportation, and transportation related air quality maintenance planning, the staff has reviewed the subject Environmental Impact Statement for consistency with the Draft 208 Plan, the 701 Plan and the South Mobile County Plan.

A review of the Environmental Impact Statement by the 208 staff shows consistency with the adopted Alabama Water Improvement Commission Policy for discharge to the Theodore Ship Channel and complies with the recommended application of best management practices during construction for the control of nonpoint source from the site. The Environmental Impact Statement also identifies practices to be used for the control of nonpoint sources from raw material storage and handling process areas, and finished product storage and handling after the plant is in operation. These practices are also consistent with recommendations in the 208 Plan.

The Environmental Impact Statement identifies some increases in particulate and sulfur dioxide levels resulting from the operation of this facility. The documentation shows these increases to be within the National Ambient Air Quality Standards and to meet the Environmental Protection Agency Prevention of Significant Deterioration requirements for new sources.

The proposed Theodore site development plan contained in the Environmental Impact Statement has been found to take into consideration the total environs of the area. Ideal is to be commended in their approach and in the proposed layout of the complex including rail and roads in such a manner as to protect the sensitive areas of the plant site, to enhance the remaining portion of the site and at the same time to mitigate the unavoidable impacts during construction of the facility.

The South Alabama Regional Planning Commission recommends that the proposed permits be issued that will allow Ideal Basic Cement to begin construction of the facilities as described in the Environmental Impact Statement. We are of the opinion that this facility as proposed will contribute significantly to the economy of the Mobile area and provide long term employment with minimal environmental effects.

H-43

J.S. Walton & Co.
established 1919
General Contractor

June 23, 1978

Ideal Basic Industries
Cement Division
P. O. Box 9904
Mobile, Alabama 36609

Attention: Mr. John C. Thomason
Assistant to the President
and Project Director

Gentlemen:

Our firm strongly endorses the development of Ideal Basic Industries' Gulf Coast cement plant at Theodore, Alabama and the Monroe County limestone quarry in Monroe County, Alabama.

Ideal Basic Industries has been and will continue to be a strong supporter of community activities in both of these locations. They have added much to the development of the economy in Mobile and Monroeville, Alabama.

We feel that Ideal Basic Industries has taken extensive measures in performing its environmental responsibilities and therefore should proceed with haste in the development of their project.

Very truly yours,

Norman J. Walton
Partner

jbf

7409 Howell's Ferry Road • P. O. Box 863 • Mobile, Alabama 36601 • 205/344-0282

The U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N. E.
Atlanta, Georgia 30308

Re: EPA 904/9-78-005
NPDES Application Numbers:
AL0028819, Limestone Quarry
Applicant: Ideal Basic Industries, Inc.
Work: Construction and Operation of
the Limestone Quarry, Monroe
County, Alabama

We, the undersigned, in view of the environmental safeguards and measures being undertaken by Ideal Basic Industries, Inc., to avoid adverse or detrimental impacts from construction and operation of the Limestone Quarry in Monroe County; in view of the efforts being taken by Ideal to protect the surrounding area to the Quarry site; and, in view of the substantial economic benefits to be derived in Monroe County and the neighboring counties from operation of the project, we wish to enter this statement of support for the project. We also wish to express our sincere appreciation to Ideal for the attitude they have shown in coming into our community particularly their complete openess and early communication with the community.

As the nearest residents to the Limestone Quarry to be constructed and operated by Ideal Basic Industries, Inc., we wish to express our wholehearted support for this project.

Fanny R. Gaillard
[illegible] Broughton
Tom Nichols
Tom Perkins
Andrew J. [illegible]
Mazell Bryant
John Nichols

H-45

June 26, 1978

United States Enviromental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30308

RE: EPA 904/9-78-005
NPDES Application Number: AL0028801, Cement Plant

APPLICANT: Ideal Basic Industries, Inc.

WORK: Construction and operation of a cement plant in the Theodore Industrial Park

---

My name is Fran Bryan and I appear before you as a private citizen, one who strongly supports the construction and operation of a cement plant by Ideal Basic Industries in Mobile.

I have reviewed both the economic and environmental impact that this plant will have on the Mobile community. Ideal Basic Industries has invested or will invest over 20 million dollars in environmental safeguards. Weighing the low and moderate impact on the environment of this community and weighing the tremendous economic impact this company will have on this community and its citizens, I wish to enter my statement of strong support for the project.

Ideal's direct payroll will be amplified by the indirect benefits to spin-off industries within the community, and as a private citizen hope to inject a positive statement for this company because I believe that they have done all that is possible to insure safety within this community.

Fran Bryan

Fran Bryan
917 Memory Lane
Mobile, Alabama

STATEMENT OF CONGRESSMAN JACK EDWARDS

FIRST CONGRESSIONAL DISTRICT, ALABAMA

IDEAL BASIC INDUSTRIES' PROPOSED GULF COAST CEMENT FACILITY

JUNE 26, 1978

H-46

MR. EDWARDS: I am pleased to have this opportunity to express my full support for the Ideal Basic Industries' proposed new cement plant here on the Gulf Coast at the Theodore Industrial Park.

I have been working with Ideal Cement and other local businesses and industrial concerns, as well as with the U.S. Army Corps of Engineers and my colleagues in Congress, to plan for the careful development of the Theodore Industrial Ship Channel and the adjacent industrial park. The Mobile area is experiencing unprecedente commercial and industrial growth; and this very exacting and detailed planning is essential to protect our important resources for the future. We welcome industrial expansion on the Alabama Gulf Coast. We greatly need the economic stimulis and employment opportunities it brings. But it is important that we protect the vital resources which have attracted this development to our area.

In fiscal year 1978, $4 million in federal funds were appropriated to continue the design and preconstruction planning of the Theodore Channel. The current expected completion date for this project, for which the House has passed funding for fiscal year 1979, is December 1980. To date approximately $422 million in private capital has been expended in the adjacent industrial park. The investment which Ideal Basic Industries plans to make in the industrial park, and for which the company has already purchased a site, is an integral factor in the overall project's impressive 2.7 to 1 benefit/cost ratio.

I have reviewed the Draft Environmental Impact Statement for the proposed facility, and I have discussed potential pollutant discharge and air quality problems with Ideal Basic Industries officials. I am convinced that the environmental planning for the proposed cement plant and quarry is conscientious and is technically feasible, and I believe that any environmental changes occurring in connection with the project will be carefully watched and minimized as much as possible.

In my judgement, Ideal Basic Industries has taken extensive measures to meet its environmental responsibilities. I urge the Environmental Protection Agency to expedite processing of the Environmental Impact Statement and to move forward with the issuance of the necessary permits needed by Ideal Basic Industries. Again, I wish to state my full support for these proposed Alabama facilities.

Jack Edwards

Jack Edwards

RESPONSES TO SUBSTANTIVE COMMENTS

Mrs. Marisa Gardner, Health and Environment Chairman of the Mobile Community Organization (Hearing Testimony, pp. 70-72)

EPA Region IV has reviewed the location of the proposed plant at the Theodore Industrial Park for meteorological significance. No adverse impacts in relation to meteorology were found.

Mrs. Myrt Jones, President, Mobile Bay Audubon Society (Hearing Testimony, pp. 75-81)

1. The proposed cement plant has been designed with fugitive dust controls to reduce the particulate emissions from the site. The raw material handling system will have baghouses and water sprays to control possible dust emissions from the conveyor systems. The wetter materials (limestone and wet clay) will have sufficient inherent moisture to suppress dust generation during storage. The other materials (coal, dry clay, gypsum, sand, and iron ore) will be stored in a covered area. The barges and railroad cars transporting raw materials to the plant will not be covered since the potential for generating dust during transport is minimal. All cement leaving the plant will be in enclosed bulk trucks, railroad cars, or barges, or will be bagged.
2. The underground fuel storage tanks will be of proper design to resist leakage into the surrounding clay soils.
3. Spill Prevention Control and Countermeasure Plan will be developed for the plant as required under 40 CFR 112.
4. Ideal Basic Industries has prepared a comprehensive Environmental Protection Plan During Construction (see Appendix C) for implementation by all contractors.
5. The use of pile-supported or trestled roadways was evaluated but found to be economically prohibitive in relation to the small

Preceding page blank

wetland area [0.2 hectare (0.5 acre)] lost. Ideal is planning to create a 0.6-hectare (1.5-acre) wetlands in an upland area as a mitigation measure (see Chapter VI for further details).

6. A permeable roadway and parking surface, while reducing some of the potential runoff from stormwater, would cause fugitive dust emissions and high suspended solids levels in the runoff.
7. As stated in the DEIS (p. 75), some material will be chipped and mulched. There are several other alternatives available: selling for wood products, burning under forced drafts (gives best results in minimizing air emissions), removing to a solid waste disposal site, or making available for public uses. It would not be economically feasible to process the wood fiber nor would it be technically suitable as supplementary fuel for cement plant operations because of heating values, water content, material size, difficulty of injection, and residues affecting the product.
8. The expected volume of available waste oil would not warrant the costs of utilizing it in the operations. In addition, the oil would not be technically suitable as a supplementary fuel because of different combustion characteristics and because it may possibly contain toxic heavy metals and other residues. The best use for the waste oil is in marketing the product to an industry that specializes in recycling.
9. It is not anticipated that the clarification basins at Theodore will be reservoirs suitable for obtaining water for dust suppression. Rather, they will function by catching and holding surface water runoff temporarily for clarification purposes. For these basins to be able to handle storm event runoff they cannot be holding significant quantities of water. To maintain the effectiveness of the natural filtering system for runoff going to North Fork Deer River, it is imperative that vegetative cover behind the filtering berm be maintained. Maintaining this cover would not be possible if the area served only as a water-holding reservoir. Thus, the temporary storage of water in the clarification basins would not lend itself to regular demands and use for dust suppression purposes.

10. The general stormwater runoff discharged from the catchment area to the marshland is believed to be of such quality that it will not overload the marshland's natural cleansing and filtering action. This technique is considered a best management practice for stormwater runoff.
11. This agency feels that impacts of the project on any rare and endangered species are of low magnitude and low significance at this specific site (see DEIS, Appendix C, Impacts, p. C-59).
12. In accordance with the Ideal Environmental Protection Plan During Construction, the catchment area will be built as early as possible to avoid most impacts on the wetlands.
13. The entire plant area has been approved for the project by the Alabama Historical Commission. Recent claims of archaeological/historical sites have not been substantiated.
14. As stated in the DEIS (Appendix A, p. A-30), a transmission system for the plant's electric power needs will be located within the roadway/ railroad access corridor.
15. The use of dredge spoil in the quarry would not be acceptable due to transportation, handling, and storage problems and the general slowness of the operations. This disposal method is not considered cost-effective (see Chapter VI for additional alternatives for disposal of dredged material).
16. Although a waste recovery processing facility in coastal Alabama is a good idea, it is beyond the scope of this EIS to evaluate its potential.
17. The ecological section of the summary document is supported by Appendix B, which presents a more in-depth discussion of rare and endangered species.
18. At the limestone quarry, a minimum 30-meter (100-foot) setback will be maintained from all major streams. The scenic bluffs overlooking the Alabama River have been highlighted in Ideal's Quarrying Plan as important to maintain. The river frontage will not be disturbed except for the construction and operation of the docking/barge-loading area and the clarification basins. The wooded ravines, if within the 30-meter (100-foot) setback, will not be mined.

19. An analysis of the impact on groundwater was presented in the DEIS (Appendix C, p. C-98).

Mr. Gregory Spies, Northern Gulfcoast Archaeological Research Consortium
(Hearing Testimony, pp. 84-87)

EPA Region IV is working with the Alabama Historical Commission and the U.S. Department of the Interior to ensure compliance with all aspects of procedures for the Protection of Historic and Cultural Properties under 36 CFR 800, the National Historic Preservation Act of 1966 (Public Law 89-665), Archaeological and Historical Preservation Act of 1974 (Public Law 93-291), and Executive Order 11593 (1971).

CHAPTER V
WRITTEN COMMENTS SUBMITTED

RESPONSES TO SUBSTANTIVE COMMENTS

CHAPTER V. OTHER WRITTEN COMMENTS SUBMITTED AND RESPONSES TO THE SUBSTANTIVE COMMENTS

This section presents all letters received by EPA during the comment period May 26 through July 11, 1978. In the case of the comments which require a response (C-1, C-3, C-5, C-6, C-7, and C-17), the responses are presented immediately following the letters. The remaining comments (C-2, C-4, C-8, C-9, C-10, C-11, C-12, C-13, C-14, C-15, C-16, C-18, C-19, C-20, C-21, C-22, C-23, C-24, C-25, C-26, C-27, C-28, C-29, and C-30) are accepted and no responses are necessary.

C-1

UNITED STATES DEPARTMENT OF COMMERCE
The Assistant Secretary for Science and Technology
Washington, D.C. 20230
(202) 377-4335

July 10, 1978

Ms. Mona Ellison
Enforcement Division
U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Dear Ms. Ellison:

This is in reference to your draft environmental impact statement entitled, "Cement Plant, Theodore Industrial Park, Alabama and Limestone Quarry, Monroe County, Alabama." The enclosed comments from the National Marine Fisheries Service and National Ocean Survey are forwarded for your consideration.

Thank you for giving us the opportunity to provide these comments, which we hope will be of assistance to you. We would appreciate receiving twelve (12) copies of the final statement.

Sincerely,

Sidney R. Galler

Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs

Enclosure memos from: Mr. William H. Stevenson
National Marine Fisheries Service

Mr. Gordon Lill
National Ocean Survey

EGION IV
RANCH
A. GA.
JUL 1 7 1978

WATER
JUL 1

C-1 JUL 7 1978

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Duval Building
9450 Koger Boulevard
St. Petersburg, FL 33702

July 6, 1978

TO: Director, Office of Ecology and Conservation, EC

Robert L. Schneider JUL 07 1978

THRU: for Assistant Director for Scientific and Technical Services, F5

FROM: for William H. Stevenson
Regional Director

SUBJECT: Comments on Draft Environmental Impact Statement - Ideal Basic Industries, Mobile and Monroe Counties, Alabama (EPA 904/9-78-005) (DEIS #7805.59).

The draft environmental impact statement for Ideal Basic Industries, Mobile and Monroe Counties, Alabama, that accompanied your memorandum of June 2, 1978, has been received by the National Marine Fisheries Service for review and comment.

The statement has been reviewed and the following comments are offered for your consideration.

General Comments

1 The DEIS appears to adequately address project impacts on wetlands and fishery resources. We believe, however, that more discussion on mitigation plans for the wetlands affected by the project should be included.

Specific Comments

Impacts Appendix C (Volume IV)

Although erosion and stormwater runoff is expected to adversely affect downstream water bodies, settling basins should help to control sediment transport and minimize most potential impacts.

2 The disposal material from dredging the docking facility would probably be placed in a Corps of Engineers spoil disposal area. The dredging itself is not expected to have a detrimental impact; however, water quality within Ideal's slip, as well as Theodore Ship Channel, could fall below EPA standards.

Reproduced from best available copy.

Mitigation Appendix D (Volume IV)

3 This section should discuss the creation of 0.5-acre of regularly-flooded wetlands from uplands to compensate for the wetlands that would be lost by project construction.

4 Regarding the poor water quality within Ideal's slip, mitigation could include discharging water with high dissolved oxygen (DO) levels to the bottom of the slip in order to offset the expected depressed DO levels caused by the plant's operation.

Alternatives Appendix E (Volume IV)

5 Although the site selection and selection process were directed toward minimizing adverse environmental impact, we believe that the Abatement Measures section should address additional mitigation possibilities noted in our previous comments.

Summary Document

3. Major Environmental Impacts. (B) Operation. Pages 2-4.

6 While the EPA has made a preliminary determination that the discharges will comply with applicable water quality standards, the discharge location and the DO content could be modified to enhance Ideal's slip and Theodore Ship Channel.

4. Alternatives to the Proposed Action. (A) Plant. Pages 4-5.

7 The EIS should address the alternative of discharging treated process related wastewater and stormwater runoff into the lower water strata.

Aquatic Ecology

Page 101, paragraph 3. Mitigating Measures.

8 Since this paragraph states that ecological impacts are typically unavoidable without additional actions for mitigation, points brought out in our general discussion regarding creation of new wetlands and discharging aerated waters into the channel should be considered.

Reproduced from best available copy.

C-1

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SURVEY
Rockville, Md. 20852

C52/JLR

JUL 5 1978

JUL 5 1978

TO: William Aron
Director
Office of Ecology and Environmental Conservation

Gordon Lill

FROM: Gordon Lill
Deputy Director
National Ocean Survey

SUBJECT: DEIS #7805.59 - Cement Plant, Theodore Industrial Park and Limestone Quarry, Alabama

The subject statement has been reviewed within the areas of NOS responsibility and expertise, and in terms of the impact of the proposed action on NOS activities and projects.

The following comment is offered for your consideration.

9 Geodetic control survey monuments may be located in the proposed project areas. If there is any planned activity which will disturb or destroy these monuments, NOS requires not less than 90 days' notification in advance of such activity in order to plan for their relocation. NOS recommends that funding for this project includes the cost of any relocation required for NOS monuments.

Response to C-1

1. EPA Region IV accepts that the impacts on the wetlands at the Theodore plant site are unavoidable. These impacts will be mitigated by the following actions:
    a. Ideal Basic Industries has prepared an Environmental Protection Plan During Construction (see Appendix C). This plan summarizes the commitments of Ideal and their contractors to minimize environmental impacts.
    b. A small area [0.2 hectare (0.5 acre)] will be lost compared to the total wetland area.
    c. To mitigate the expected loss, Ideal Basic Industries plans to create a 0.6-hectare (1.5-acre) wetland area (see Chapter VI).

    The use of ecologically valuable wetlands for industrial uses is of prime concern for this Agency and has been thoroughly evaluated in the DEIS.

2. During dredging and operational phases of Ideal's docking facility, the water quality of the ship channel is not expected to vary significantly from the water quality level without the project. A more detailed description of the construction of the docking facility is contained in Chapter VI.

3. Comment accepted (see #1 above).

4. The effluent to be discharged is expected to be relatively high in dissolved oxygen (DO) compared to existing channel bottom conditions. However, this Agency feels that the expected average daily discharge of 341 cubic meters (90,100 gallons) would not affect these conditions if the effluent were discharged to the bottom of the ship channel. In addition, discharging the effluent in this manner would require pumping rather than the gravity overflow system currently planned. The additional electricity production necessary for pumping would be questionable on both an ecological and an energy basis.

5. Comment noted, see responses #1 through #4.

6. Comment responded to in #4 above.

7. The alternative of discharging the general stormwater runoff to the ship channel was evaluated in the DEIS. Basically, this alternative would provide slightly better mixing potential for the water in the docking slip. However, it would not provide water of the same quality as that which would reach the ship channel via the North Fork Deer River because in the proposed action the marsh vegetation will provide a natural filtering action to lower the solids content of the discharge.

   The proposed action is one of the better environmental designs for providing a best management practice in treating general stormwater runoff from the plant site and would not require redesigning the facility layout and drainage. In addition, the information given in response #4 indicates that the alternative pumping system would not have a significant effect on promoting mixing to raise the DO level of the lower portion of the ship channel. If the stormwater runoff and the process water discharge were combined [1,076,000 liters (284,100 gallons) average daily flow], the significance would still be of the same level.

8. All points (#1 through #7) have been considered by EPA Region IV and have been presented above.

9. Based on available survey information, there are no geodetic control survey monuments on either of the proposed project properties.

C-2

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
AREA OFFICE
DANIEL BUILDING, 15 SOUTH 20TH. STREET, BIRMINGHAM, ALABAMA 35233

REGION IV
Pershing Point Plaza
1371 Peachtree Street, N.E.
Atlanta, Georgia 30309

IN REPLY REFER TO:
4.2SS

Mr. John C. White
Regional Administrator
Environmental Protection Agency
345 Portland Street, N. E.
Atlanta, Georgia 30308

Dear Mr. White:

Subject: Draft Environmental Impact Statement for
Ideal Basic Industries Cement Plant and Limestone Quarry
Monroe County, Alabama

We are pleased to acknowledge receipt of the above referenced request for HUD comments under the requirements of the National Environmental Policy Act of 1969 (P. L. 91-109).

We have reviewed the information submitted along with your referral and, to the extent of available staff resources, have investigated the environmental impact, adverse effect, and commitment of resources for the project involved. From the information available to us, we find that this project will not have an adverse effect on any current HUD program.

Your interest in this matter is appreciated.

Sincerely,

John E. Wilson
Area Manager

RECEIVED
EPA-REGION IV
E I S BRANCH
ATLANTA, GA.

JUL 17 1973

C-3

LAW OFFICES
ALSTON, MILLER & GAINES

CITIZENS & SOUTHERN
NATIONAL BANK BUILDING
35 BROAD STREET
ATLANTA, GEORGIA 30303
404-588-0300

1800 M STREET, N.W., SUITE 1000
WASHINGTON, D. C. 20036
202-223-1300

WATER ENFORCEMENT
JUL 10 1978
RECEIVED
IV
ATLANTA, GA.

ATLANTA, GEORGIA

July 10, 1978

ECOLOGICAL REVIEW BR.
RECEIVED
JUL 10 1978
EPA-REGION IV
ATLANTA, GA.

Enforcement Division
U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Attention: Ms. Mona Ellison

Re: NPDES Permit Application No. AL 0028801
Ideal Basic Industries Cement Plant
Theodore Industrial Park
Mobile, Alabama

NPDES Permit Application No. AL 0028819
Ideal Basic Industries Gaillard Quarry
Monroeville, Alabama

Dear Ms. Ellison:

As provided in your Joint Public Notice No. PH 78AL0018, dated May 26, 1978, I am submitting on behalf of Ideal Basic Industries the following comments on the above NPDES draft permits distributed at the Public Hearing on June 26.

1 These comments are directed to the second sentence in paragraph 2 of Part III of Draft NPDES Permit No. AL 0028801 and the second sentence in paragraph 3 of Part III of Draft NPDES Permit No. AL 0028819. These two sentences are identical and read as follows:

> "This permit shall be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitation issued or approved under sections 301(b)(2) (C), and (D), and 304(b)(2), and 307(a)(2) of the Clean Water Act, if the effluent standard or limitation so issued or approved:

> (1) Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
> (2) Controls any pollutant not listed in the permit.
>
> The permit as modified or reissued under this paragraph shall also contain any other requirements of the Act then applicable."

This language was taken from the revisions to the NPDES regulations published in the Federal Register on May 23, 1978. The language appears on page 22163 of the May 23 Federal Register as part of Section 124.46(a), which states that the above quoted language is to appear in "any permit issued to a discharger within any industrial category listed in Appendix D of this Part." Since neither the cement industry nor the limestone (crushed stone) mining industry is among the 21 point source categories listed in Appendix D, there appears to be no basis to include the above language in the draft permits for Ideal Basic Industries. In addition, since the list in Appendix D is identical to that contained in the Consent Decree in Natural Resources Defense Council v. Train, 8 ERC 2120, 6 ELR 20588 (D.D.C. 1976), the Consent Decree also provides no basis for inclusion of the language in the permits for Ideal.

The above quoted language was apparently inserted in the draft NPDES permits to insure that Ideal's permits could be modified or revised if EPA issues toxic effluent standards or limitations applicable to the cement plant or the quarry. However, this language is not necessary for that purpose because the purpose is already accomplished by paragraph B 5 of Part II of the draft permits entitled "Toxic Pollutants." The purpose is further accomplished by the following language in paragraph 2 of Part III of Draft NPDES Permit No. AL 0028801 and paragraph 3 of Part III of Draft NPDES Permit No. AL 0028819 as they appear at pages P-11 and P-21, respectively, of the Summary Document of the DEIS for Ideal's Cement Plant and Quarry:

Ms. Mona Ellison
Page 3
July 10, 1978

> "The provisions of Section 306(d) do not limit the authority of the Environmental Protection Agency to modify the permit to require compliance with a toxic effluent limitation promulgated under BAT or toxic pollutant standard established under Section 307(a) of the FWPCA."[1]

Accordingly, we can find no authority for the above language added to the draft NPDES permits distributed at the Public Hearing, and further we can find no purpose that is served by the additional language. We must therefore request that the language taken from the May 23 Federal Register be deleted from the permits and be replaced by the sentence quoted in the preceding paragraph.

With best regards.

Sincerely,

James S. Stokes, IV

JSS,IV/sfh
cc: Mr. Howard D. Zeller
Mr. T. Michael Taimi
Mr. Roosevelt Childress
Ms. Sara Turnipseed
Mr. Russell T. Todd
Mr. Robert J. Castelli
Mr. Harlan W. Powledge
Mr. John C. Thomason
Mr. Robert J. Moir

---

[1] This sentence originally included the additional phrase "or to modify, as necessary, to assure compliance with any applicable State Water Quality Standard," but it was agreed by EPA and Ideal that this phrase should not be in either of Ideal's NPDES permits.

Response to C-3:

1. EPA Region IV concurs with the comment raised and has modified the draft NPDES permits accordingly (see Appendix B).

C-4

ALABAMA FORESTRY COMMISSION
513 Madison Avenue
Montgomery, Alabama 36130

C. W. MOODY
STATE FORESTER
CHARLES A. PIGG
ASST. STATE FORESTER

July 10, 1978

Mr. John E. Hagan III, Chief EIS Branch
Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Dear Mr. Hagan:

The Forestry Commission has reviewed the Draft Environmental Impact Statement for Ideal Basic Industries Cement Plant and Limestone Quarry. We feel that the forestry sector was adequately covered, and we approve this document as it is written.

Sincerely,

James R. Hyland

James R. Hyland, Chief
Pest Control Section

JRH:nm

cc: Richard H. Cumbie

JUL 13 1978

ALABAMA
AIR POLLUTION CONTROL
COMMISSION
645 South McDonough Street Montgomery Alabama 36130
Telephone 205-834-6570
ACTS No. 345-6770

July 10, 1978

Mr. John E. Hagan III, Chief
EIS Branch
Environmental Protection Agency, Region IV
345 Courtland Street, N.E.
Atlanta, GA 30308

Dear Mr. Hagan:

This letter is intended to be this agency's comments on the DEIS for Ideal Cement's new plant at Theodore and the quarry near Monroeville. These comments deal with the air quality analysis performed at the direction of EPA for the cement plant and the conclusions drawn from the analysis.

Attached is correspondence from the Air Programs Office of EPA
Region IV regarding the air impact analysis performed for the cement
plant. The position adopted by EPA is that the analysis was sufficient
since it was done in accordance with the modeling procedures appropriate
at the time the application was submitted. The procedures have changed
since the analysis was performed and are expected to change again in the
future. It is EPA's position that sources, which later propose to
construct in the vicinity of Ideal Cement, will be required to assess
their impact and the impact of Ideal's plant using the revised procedures.
1 The changes in the procedures which have already occurred would likely
result in a greater consumption of the increment than identified in the
DEIS.

It is thus not possible to develop conclusions regarding the
impact of the construction of Ideal Cement on future growth since the
2 impact attributable to this construction will change when the next source
proposes to construct in the area. Page 60 of the Summary Document
contains the following statement:

> "Therefore, the utilization of the PSD increments by the proposed plant is considered to be of moderate magnitude, but of low overall significance to the future growth of the industrial park."

Similar statements are contained throughout the DEIS.

All statements which contain conclusions about the impact of Ideal's construction on future growth in the area should be deleted from the DEIS. Until the analysis is performed in a manner which identifies the consumption of the increment which will be attributable to Ideal in future analyses, no conclusions regarding impact on future growth is appropriate.

If you have any questions in this matter, please advise me.

Yours very truly,

James W. Cooper, Director
Division of Air Pollution Control
Alabama Air Pollution Control Commission

JWC/REG:ldg

Attachments

C-5

ALABAMA
AIR POLLUTION CONTROL
COMMISSION
645 South McDonough Street, Montgomery, Alabama 36130
Telephone 205-834-6570
ACTS No. 345-6770

January 18, 1978

Mr. Tom Helms, Deputy Director
Air and Hazardous Materials Division
Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, GA 30308

Dear Mr. Helms:

We recently received the PSD air quality analysis prepared by Ideal Cement at the direction of EPA. This analysis uses several techniques that appear to be inconsistent with previous guidance provided this agency.

According to your letter dated November 4, 1977, when determining the PSD increment depletion for short-time periods, maximum allowable emission rates at maximum operating capacity should be used for baseline concentration levels and future year concentration levels. However in the Ideal analysis, actual emissions were used for baseline concentration while allowable emissions were used for the future year.

According to the Interim Guidelines on Air Quality Models (Section 5.4, Background Air Quality), background concentrations for short-time periods should be determined using meteorological conditions similar to that producing the highest, second-highest estimated concentrations for the sources under review. However, the Ideal analysis apparently did not use the same meteorological conditions for the baseline concentration determination as for the future year determination. Careful analysis can show that it is possible for the technique used by Ideal to underestimate the PSD increment depletion, beside being very unrealistic for actual background determination.

Finally, the definition of baseline for determining increment depletion is ambiguous in the immediately effective and proposed revision to the PSD regulations. The Ideal analysis assumes the definition of baseline is unchanged.

Please advise me if the techniques identified above will be acceptable in a modeling analysis for sources to be reviewed in the future.

Also, the air quality impact identified in EPA's preliminary PSD determination is based on model outputs not contained in Ideal's permit application. I ask that you provide a copy of the model runs, including emission levels assumed, which were used by EPA to determine the air quality impact. I also wish to be advised which model runs and results Air Programs intends to include in the Draft EIS.

If you have any questions about the issues raised in this letter, please advise.

Sincerely,

James W. Cooper, Director
Division of Air Pollution Control
Alabama Air Pollution Control Commission

JWC/KJA:gmt

C-5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30308

FEB 14 1978

Mr. James W. Cooper, Director
Division of Air Pollution Control
Alabama Air Pollution Control Commission
645 S. McDonough Street
Montgomery, Alabama 36104

Dear Mr. Cooper:

Your January 18, 1978 letter addressed inconsistencies in the Ideal Cement PSD air quality analysis with previous guidance provided by EPA. Your comments have been incorporated into techniques that will be acceptable in a modeling analysis for new sources as follows:

- When determining PSD increment depletion for short time periods, maximum allowable emission rates at maximum operating capacities should be used for baseline and future year concentration levels. In some cases, maximum ground level concentrations occur at lower operating capacities. Thus, 50% and 75% capacities should also be modeled; i.e., power plants. The Ideal analysis was performed under previous guidance which has since changed to require this allowable/allowable comparison.

- Background concentrations for short time periods should be determined using meteorological conditions similar to that producing estimated concentrations for highest, second highest estimated concentrations for sources under review. This assumes 5-year meteorological data. Second highest, maximum concentrations are used with one year of meteorological data. These maximums should be based on an analysis which utilizes one-tenth kilometer increments in determining the maximum concentration. The technique used by Ideal is approvable under the definition of baseline in the Clean Air Act Amendments of 1977. We are awaiting guidance from headquarters on this matter.

- The baseline for determining increment depletion is the ambient concentration level reflecting air quality as of January 6, 1975 (major stationary sources or modifications on which construction commenced prior to January 6, 1975, but were not in operation as of

RECEIVED
FEB 15 1978
Alabama Air Pollut
Control Comm

January 6, 1975, shall be included in the baseline and shall not count against the available increment), determined by: 1) using appropriate atmospheric dispersion models based on 1974 emissions, or 2) utilizing air quality data obtained pursuant to the monitoring requirements of Section 165(e)(1)and (2) of the Act or any other valid air quality data obtained since 1974, and adjusting this data to eliminate the air quality impact of all new sources since January 6, 1975.

In regard to your request concerning the model outputs for the air quality impacts identified in EPA's preliminary determination, we have contacted David Buff of Environmental Science and Engineering, and he will be forwarding you this information shortly. These model outputs will be used in the Draft EIS.

We appreciate your concern in performing an acceptable PSD analysis, and if we can be of any further assistance, please contact me.

Yours truly,

G. T. Helms

G. T. Helms, P.E.
Deputy Director
Air & Hazardous Materials Division

C-5

March 8, 1978

Mr. Tom Helms, Deputy Director
Air and Hazardous Materials Division
Environmental Protection Agency, Region IV
345 Courtland Street, N.E.
Atlanta, GA 30308

Dear Mr. Helms:

Your letter of February 14 indicated that the emission levels assumed in the modeling analysis performed by Ideal were not consistent with current EPA guidance.

Do the model results using the assumptions acceptable at the time the analysis was performed still represent the consumption of the increment or must the actual consumption be determined using the current assumptions? At what stage in the review process must revisions to the modeling techniques be applied to sources? Are revisions applicable retroactively to sources which have previously been approved? Does EPA intend to run models consistent with current guidance for Ideal?

I also am asking for clarification regarding background levels for evaluating the short-term increment consumption. It was indicated that the same meteorological conditions should be used in the baseline and future year models. Ideal's analysis did not. It was indicated, however, that Ideal's analysis is approvable. The technique used by Ideal would result in a smaller projected consumption of the short-term increment than using the same meteorological conditions for both model runs. For example, using the same meteorological conditions results in twice the projected consumption of the short term particulate increment (23 ug/m^3 vs 11 ug/m^3) then using Ideal's technique for their project.

Two techniques which yield different results cannot both be used to determine if a new source would cause a violation of this increment. If, for a hypothetical source, model results using the same meteorological conditions for the base and future years indicated a violation of the increment and the model results using Ideal's technique showed compliance with the increments, would EPA deny permission to construct? If the answer is no, then Ideal's technique should be used in all PSD analyses.

OFFIC[illegible]

If any of these questions require clarification, please let me know.

Yours very truly,

Jim Cooper

James W. Cooper, Director
Division of Air Pollution Control
Alabama Air Pollution Control Commission

JWC/REG:ldg

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30308

MAY 4 1978

DLC
RECEIVED
MAY - 8 1978 ✓
Alabama Air Pollution
Control Commission

Mr. James W. Cooper, Director
Division of Air Pollution Control
State of Alabama Department of Public Health
645 S. McDonough Street
Montgomery, Alabama 36104

Dear Mr. Cooper:

Your March 8, 1978 letter asks several questions concerning the consumption of the increment by the proposed Ideal Cement Plant. Increment consumption was predicted by comparing baseline actual emissions and projected allowable emissions. After the completion of this air quality analysis, EPA informed you that future modeling would compare allowable baseline and allowable projected emissions. We did not require Ideal Cement to remodel because their modeling analysis, using an actual-allowable comparison, was more restrictive.

Once modeling techniques are approved by the State or EPA, any future revisions to modeling techniques will not be applied to the source being reviewed. Revisions are applicable retroactively to sources which have been previously approved, however, new modeling techniques will only impact the next source which interacts with the approved source.

In terms of background levels for evaluation of short-term increment consumption, the same meteorological conditions are to be used in the baseline and future year analyses. Ideal Cement's did not, but it was approvable since our guidance at that time advocated comparing concentrations predicted using different meteorological conditions. Although this change in modeling will not alter Ideal's approval, the State can reevaluate Ideal's impact using the baseline future year comparison of the same meteorological conditions. This change in increment consumption could be applied to future sources proposing construction in the area.

With the upcoming promulgation of final PSD regulations, our Regional policy for approved modeling techniques may change. We will notify you if these changes occur. If you have any further questions, please contact me or Mr. Eliot Cooper of my staff.

Sincerely,

G. T. Helm

G. T. Helms, P.E.
Deputy Director
Air & Hazardous Materials Division

cc: Jonny Sanders
Mobile County Health Department

ALABAMA
AIR POLLUTION CONTROL
COMMISSION
645 South McDonough Street, Montgomery, Alabama 36130
Telephone 205-834-6570
ACTS No. 345-6770

May 30, 1978

Mr. Greg Glahn, Acting Director
Air Programs Branch
Environmental Protection Agency, Region IV
345 Courtland Street, N.E.
Atlanta, GA 30308

Dear Mr. Glahn:

This is in response to Mr. Helms' letter of May 4, 1978, regarding the models performed by Ideal for their new facility in Mobile. The approach identified would not allow coherent administration of the PSD program.

Perhaps an example would serve to best illustrate the potential problems.

(1) Sources A, B and C have applied for and obtained approval under PSD. Using the modeling procedures applicable at the time of the reviews, 80% of the increment is projected to be consumed.

(2) The techniques for performing the air quality analysis are changed.

(3) Source X proposes to construct in the same area. Model results using the new technique show that the emissions from sources A, B, and C alone will cause a violation of the increment. Source X would, however, only consume 5% of the increment using the new technique.

The approach identified in Mr. Helms' letter would require that source X be denied permission to construct, even though adding his impact to those previously attributed to other sources in their PSD reviews would not be a violation of the increment (i.e., 80% + 5%). Since there would be modeling results which show that a violation of the increment has been allowed to occur by previously granting approval to sources A, B, and C, would corrective action be required to protect the increment? The latest draft PSD regulation would appear to require such action.

If corrective actions were required, approvals given under PSD would be of little value since construction in accordance with the conditions of approval provide no assurance that a change in the analytical technique will not require additional measures. Mr. Helms' letter implies that this would not be required. If this is true, then source X, which has a minimal impact on air quality, would be precluded from constructing solely because of a change in the modeling technique that happened to occur before it submitted its application. Sources A, B, and C, which were approved under PSD, would be allowed to violate the increments, while source X would be precluded from constructing regardless of its impact, because a violation exists.

Another problem, of course, is that the public comment period held on the PSD reviews and environmental impact statements (if necessary) on sources A, B, and C would not have properly identified the impact and consequences of the construction. The fact that construction of these sources precluded additional growth would not have been identified.

There are occasions when overly conservative modeling techniques and assumptions are used to determine if the air quality impact is permissible. While techniques, such as this, do not purport to identify the absolute consumption of the increment, they are adequate to make the determination required by the regulations. It would thus seem appropriate to adopt the policy that the consumption of the increment attributed to a specific source would not in the future be changed to exceed that identified in the analysis supporting approval under PSD.

If the EIS for Ideal Cement contains the same air quality analysis that was in the preliminary draft, it will not accurately identify the air quality impact of the proposed construction. Either the EIS should be changed to reflect the consumption of the increment using current techniques or the impacts identified in the EIS should be the upper limit used in future analysis of sources constructed in the area. One of these two approaches must be adopted in order to administer a systematic program for the prevention of significant deterioration.

In summary, I ask that EPA respond to the following questions:

(1) What would be the appropriate action in the example situation given?

(2) What action does EPA intend to take regarding the calculated air quality impact of Ideal Cement?

If you have any questions, please advise.

Yours very truly,

James W. Cooper, Director
Division of Air Pollution Control
Alabama Air Pollution Control Commission

JWC/REG:ldg

C-5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30308

June 19, 1978

Mr. James W. Cooper, Director
Division of Air Pollution Control
Alabama Air Pollution Control Commission
645 South McDonough Street
Montgomery, Alabama 36103

Dear Mr. Cooper:

Your May 30th letter asked the following questions concerning the example situation given:

1. What would be the appropriate action in the example situation given?
2. What action does EPA intend to take regarding the calculated air quality impact of Ideal Cement?

We offer the following responses:

1. Source X would be precluded from constructing because a change in the modeling technique happened to occur before the source submitted an application for a permit to construct.
2. The next source proposing construction in the Theodore area whose allowable emissions are greater than 50 tons per year for particulates, will be required to model all emissions increases/decreases in the Theodore area since the baseline year. This modeling will predict interactions and resulting increment consumption. No baseline case will be modeled. Thus the maximum impact from Ideal Cement will be modeled in the interaction.

I hope this clarifies our position in this matter and I appreciate your concern for potential problems facing new sources proposing construction in the Theodore area and the agencies reviewing them. If you have any further questions, please do not hesitate to contact me.

Sincerely yours,

Gregory J. Glahn

Gregory J. Glahn
Acting Chief
Air Programs Branch

FEIS.2/C-5.1
8/14/78

Response to C-5

1. The air quality analysis for the DEIS was essentially the same as that performed for the Prevention of Significant Deterioration (PSD) review. The Mobile County Board of Health, the Alabama Air Pollution Control Commission, and EPA Region IV have reviewed and accepted this analysis through a series of inter-agency memoranda. The modeling techniques used were very conservative and thus the results are considered to be overestimates of the impact on air quality. Although the methodology was correct and acceptable at the time it was performed, a similar project today would be reviewed differently due to recent EPA policy decisions. It is possible that a re-review of the PSD analysis would indicate a slight increase in the consumption of the allowable increments. Since both the EPA's authority to construct and the appropriate state and county construction permits have been issued and the results would not vary significantly, a re-review is not required.

2. The statement in the DEIS, "...utilization of the PSD increments... is considered to be of moderate magnitude but of low overall significance to the future growth of the industrial park" (p. 60), is considered to be valid for the proposed project. The rationale presented in the DEIS is believed to be correct and appropriate even if additional modeling were performed.

United States Department of the Interior

OFFICE OF THE SECRETARY

Southeast Region / 148 International Blvd., N.E. / Atlanta, Ga. 30303

JUL 7 1978

ER-78/481

Mr. John C. White, Regional Administrator
U.S. Environmental Protection Agency
345 Courtland Street
Atlanta, Georgia 30308

Dear Mr. White:

We have reviewed the draft environmental impact statement (DEIS) for Ideal Basic Industries Cement Plant and Limestone Quarry, NPDES Permit, Mobile and Monroe Counties, Alabama, requested by your letter dated May 19, 1978.

We offer the following comments:

General Comments:

1 The DEIS adequately describes the present environment at the plant and quarry site and the possible impact of the construction and operation. The recreational and cultural interests have been adequately addressed in the statement.

Specific Comments:

Appendix A, pages A-20; A-67

2 The construction of the ship channel extension will require the removal of approximately 500,000 cubic yards. The DEIS suggests use of the spoil disposal areas owned/controlled by Alabama State Docks. Spoil placement areas are in critically short supply, and are needed for channel maintenance. We believe that most of the material which needs to be removed from the proposed ship channel should be handled mechanically and used as "fill" on the proposed plant construction site. The use of this material would decrease the quantity of additional fill material that would have to be obtained for plant construction.

Appendix A, page A-81; Appendix B, page BAE-2

According to the DEIS, the treatment of industrial wastewater will be accomplished by the use of settling basins which will continuously discharge into the ship channel. As described in the DEIS, the water

3 quality in the present channel is seasonally poor. We are concerned that inadequately treated waste water will further decrease the channel water quality and in turn will adversely affect the aquatic resources in the water bodies. We suggest that the waste water receive more comprehensive treatment so that it will meet or exceed the category of "Fish and Wildlife" of the Alabama Water Quality Standard. We further suggest that the effluent be aerated to oxygen saturation level prior to discharge, and that the discharge be pumped into the bottom of the dead end ship channel.

Appendix A, page A-83 and Summary Section of EIS, page 86

4 We are concerned about the handling of storm runoff. The runoff will be directed into a 5-acre grassy, bermed area and then into a fresh-water marsh and North Fork Deer River. The runoff will contain a number of pollutants including oil, lime, etc. This material, in uncontrollable volumes expected during heavy rains, will permeate the marsh areas and destroy the vegetation. The statement, "The impact is considered long-term but reversible," is not acceptable. The final statement should state that the storm runoff be directed to holding ponds, treated, and discharged into the ship channel.

Appendix A, page A-19

5 The final statement should address extending the roadway and railroad trestles needed to cross North Fork Deer River so that all low areas and floodways will be included.

We appreciate the opportunity to review and comment on this environmental statement.

Sincerely yours,

James H. Lee

James H. Lee
Regional Environmental Officer

Response to C-6

1. Comment accepted; no response necessary.

2. EPA Region IV and Ideal Basic Industries have investigated the possible use of dredged material as fill at the plant site. A complete discussion of this and other alternatives for disposal of dredged material is presented in Chapter VI of the FEIS.

3. The wastewater discharge will be of better quality than that of the ship channel. The discharge has been shown to be non-toxic and will meet Alabama's Fish and Wildlife Standards. An explanation of the dissolved oxygen levels and a possible change of discharge location is contained in Response 4 to comment C-1.

4. As stated in the DEIS (p. 86), the present plans for general stormwater runoff conform to Alabama's best management practices. Additional controls are not practical due to the large volume of runoff and ineffective treatment means for runoff from intermittent rainfall events. Due to the nature of the drainage area, oil and lime are not expected to be found in the stormwater runoff. The major pollutant should be suspended solids from the natural soils which should settle out in the catchment basins in the plant site area.

   The impact is still considered to be long-term (as long as the plant is present) but reversible due to the natural cleansing action of the marshland vegetation.

   The rationale for not directing the stormwater runoff into the ship channel is contained in Response 7 to comment C-1.

5. EPA Region IV agrees that complete trestling of the wetlands by the access roadway would be preferable from an environmental standpoint. However, the additional costs (approximately $300,000) would not be cost-effective in comparison to saving 0.2 hectare (0.5 acre) of wetlands. As stated previously, Ideal plans to create a 0.6-hectare (1.5-acre) wetland area in an upland area (see Chapter VI) in order to mitigate the loss of existing wetland area.

C-7

Department of Energy
Region IV
1655 Peachtree Street, NE
Atlanta, Georgia 30309

JUL 07 1978

Mr. John C. White
Regional Administrator
Environmental Protection Agency
345 Courtland Street
Atlanta, Georgia 30308

Dear Mr. White:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for Ideal Basic Industries Cement Plant and Limestone Quarry (EPA 904/9-78-005).

1 Analysis of the Statement did not reveal any reasons for DOE to oppose this proposed action. The use of coal as a fuel rather than gas or oil, and the use of the dry process rather than the wet process for manufacturing the cement is in keeping with DOE objectives in the area of energy conservation. The routing of waste heat from the rotary kiln and the clinker coolers to the raw mills and the preheater is commendable.

2 It is recommended that if significant quantities of wood are obtained during the land-clearing of the sites, this material be used for boiler fuel, as listed on page 14, if at all practical.

If we can be of further assistance to you, please contact Robert Biccum at (404) 881-2526.

Sincerely,

Roy F. Pettit
Acting Regional Representative

EPA REGION IV
E I S BRANCH
ATLANTA, GA.

JUL. 10 1978

Response to C-7

1. Comment accepted; no response necessary.

2. Due to recent timbering operations on the Theodore property, significant quantities of wood for fuel are not available. The use of land-clearing wastes as fuel for a local wood-burning boiler was discussed in the DEIS (p. 78). This alternative is not practical due to the additional time and expense involved.

   At the remote quarry site in Monroe County, the loading and transportation costs of handling the tree wastes would be excessive.

C-8

State of Alabama
Department of Public Health
State Office Building
Montgomery, Alabama 36130

IRA L. MYERS, M. D.
STATE HEALTH OFFICER

July 6, 1978

Ms. Mona Ellison
Enforcement Division
U. S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Dear Ms. Ellison:

The State of Alabama Department of Public Health Environmental Health Administration wishes to advise that it has reviewed the draft environmental impact statement for Ideal Basic Industries to be located at Theodore Industrial Park, Alabama, AL0028801 and the limestone quarry to be located in Monroe County, Alabama, AL0028819 and we wish to advise that the statements contained therein relating to the disposal of solid waste appear to be feasible and apparently will not significantly cause degradation of the environment. Of course, a more detailed evaluation of the project will be made at the time that specific permit applications are filed with the appropriate agencies.

Yours very truly,

W. T. Willis, Director
Environmental Health Administration

WTW/eh

cc: Mr. A. S. Chipley

RECEIVED
EPA-REGION IV
E I S BRANCH
ATLANTA, GA.

JUL 10 1978

Delchamps

July 6, 1978

Mr. John E. Hegan, III
Environmental Protection Agency
Region 4
345 Courtland Street N.E.
Atlanta, Georgia 30308

Dear Mr. Hegan:

I am writing to express my full support for the construction of the proposed Ideal Basic Industries cement plant in the Theodore Industrial Park. I understand your agency has drafted an Environmental Impact Statement for the project, so I am sure it is not necessary for me to elaborate on the extensive measures taken by Ideal to meet their environmental responsibilities for this significant project.

I have had the opportunity over the last several years to work closely with Ideal in my capacity as President of the Mobile Area Chamber of Commerce from 1973 to 1975, and more recently as a member of the Industrial Development Board for the City of Mobile. I am confident that Ideal and its management have done an extremely thorough job of planning this new facility and, as a long-time corporate citizen of the Mobile area, they have always demonstrated an awareness of public concerns.

I, along with many other citizens in the Mobile area involved with the project over the years, am looking forward with great anticipation to the start of construction.

Sincerely,

O. H. Delchamps, Jr.

OHDJr:jm

EIVED
REGION IV
BRANCH
LANTA, GA.

JUL 10 1978

July 5, 1978

United States Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30308

RE: EPA 904/9-78-005
NPDES Application Number: AL0028801, Cement Plant

APPLICANT: Ideal Basic Industries, Inc.

WORK: Construction and Operation of a Cement Plant in the Theodore Industrial Park

---

I would like to go on record as being in full support of the proposed Ideal Basic Industries Cement Plant in the Theodore Industrial Park. I am a resident of the area and also operate a business within five miles of the proposed plant site.

As a resident, I have every confidence that Ideal Basic Industries will do everything necessary to protect the environment as much as possible in the area and as a business owner, I know that the economy in Mobile will certainly benefit from the construction and operation of this new cement plant.

Please enter my statement of full support into the records of public comments in reference to the proposed cement plant in the Theodore Industrial Park by Ideal Basic Industries, Inc.

Mrs. L. W. Atchison
Schillinger's Road
Mobile, Alabama

JUL 10 '78

C-11

July 5, 1978

United States Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Goergia 30308

RE: EPA 904/9-78-005
NPDES Application Number: AL0028801, Cement Plant

APPLICANT: Ideal Basic Industries, Inc.

WORK: Construction and Operation of a Cement Plant in the Theodore Industrial Park

---

This letter is written to express my strong support for the proposed construction and operation of Ideal Basic Industries' new cement plant to be located in the Theodore Industrial Park.

As a citizen of Mobile and as an employee of a retailer within the area, I feel that the benefits of the plant to Mobile - both to it's citizens and to the economy - far exceed the environmental problems expected and Ideal is taking all measures they can to insure that these problems are moderate to low in significance, as presented in their Environmental Impact Statement.

I would very much appreciate your entering my letter of support into the records.

Albert Langley
2353 N. McVay Drive
Mobile, Alabama 36605

JUL 10 1978

C-12

July 5, 1978

United States Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30308

RE: EPA 904/9-78-005
NPDES Application Number: AL0028801, Cement Plant

APPLICANT: Ideal Basic Industries, Inc.

WORK: Construction and Operation of a Cement Plant in the Theodore Industrial Park

---

As a private citizen and a resident of Mobile, I would like to take this opportunity to enter my support for the proposed cement plant to be operated by Ideal Basic Industries in the Theodore Industrial Park.

The construction and operation of this plant may present some environmental problems, as would any industrial facility but we can't just simply stop all industrial growth to protect our environment. That would be like having a zoo but not putting any animals in it so it won't get dirty. Ideal Basic Industries has put forth every effort to see that this new cement plant operates as environmentally safe as possible - spending over $20 million dollars alone on environmental safeguards to achieve this.

I would like to go on record as being in full support of this facility as I feel Ideal Basic Industries has shown good faith to the citizens of Mobile by allowing the citizens to make statements such as this - for or against.

Kathryn Manders

Kathryn Manders
1500 Airview Drive
Mobile, Alabama 36605

C-13

Mr. John E. Hagan, III, Chief EIS Branch
Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia

Dear Mr. Hagan,

As a property owner in the Tillman's Corner, Theodore section of Mobile County, I would like to submit for the record my support of the construction and operation of a cement plant by Ideal Basic Industries at the Theodore Industrial Park.

Certainly, the company has taken all precautions in insuring that the environment of this county is not adversely affected. I look forward with anticipation to the construction of this plant which will have a significant impact on the economy of all of Mobile County.

Sincerely,

J. M. Doster
4171 Vega Drive
Mobile, Alabama 36609

JUL 10 1978

C-14

Bayou La Batre Area Chamber of Commerce

P.O. Box 486 • Bayou La Batre, Alabama 36509

July 5,1978

John E. Hagan III, Chief EIS Branch
Enviormental Protection Agency
Region 4
345 Courtland St. N.E.
Atlanta, Ga. 30308

Dear Sir:

After attending the June 26 public hearing and reviewing all the information at hand, the Bayou La Batre Chamber of Commerce endorses the construction and operation of the Ideal Cement Plant at the Theodore Industrial Park.

We feel that the enviorment will not be threatened and the economy of our area will have a good chance to grow.

Sincerely,

Edw. R. Zewen Jr.
Secretary

ERZ:sz

EGION IV
BRANCH
GA.

JUL 10 1978

SENATE CHAMBER
MONTGOMERY, ALABAMA 36130

ALABAMA
BILL ROBERTS
STATE SENATOR 35TH DISTRICT
OFFICE—148 TUSCALOOSA STREET
MOBILE
36607
RES.—ROUTE 1, BOX 278
THEODORE
36582

COMMITTEES:
CHAIRMAN, LOCAL GOVERNMENT
CONSTITUTION AND ELECTIONS
CONSERVATION
EDUCATION
SEAPORTS AND INLAND WATERWAYS

July 5, 1978

United States Environmental
Protection Agency
Region 4
345 Courtland Street
Atlanta, Georgia 30308

Gentlemen:

I am writing to inform your Agency of my support for the location of Ideal Basic Industries in the Mobile area. I am referring to limestone quarry, Monroe County, Alabama EPA 904/9-78-005.

[illegible] 3 [illegible]

As a member of the House of Representatives, I served on the Health Committee and was chief sponsor of the Alabama Air Pollution Control Act of 1971 and co-sponsor of the Alabama Water Pollution Control Act of 1971. I have served on the Conservation Committees in both the House and the Senate. Consequently, I have an understanding and appreciation of the balance between industrial growth and development and a relatively clean environment. I feel Ideal Basic Industries has taken the necessary steps to adequately comply with environmental laws which will make them a good neighbor, as well as a contributing member of the Mobile community.

Thanking you in advance for your consideration in this matter, I remain

Sincerely,

BILL ROBERTS

BR/ds
cc: Mr. John Thomason

C-16

SENATE CHAMBER

MONTGOMERY, ALABAMA 36104

ALABAMA
MIKE PERLOFF
STATE SENATOR 33RD DISTRICT
257 ST. ANTHONY STREET
MOBILE
36606

COMMITTEES:
FINANCE AND TAXATION
CONSTITUTION AND ELECTIONS
STATE GOVERNMENT
SEAPORTS AND INLAND WATERWAYS
LOCAL LEGISLATION NO. 1

July 5, 1978

United States Environmental Protection Agency
Region 4
345 Courtland Street
Atlanta, Georgia 30308

Gentlemen:

After review and consideration of the E.I.S. Summary on Ideal Basic Industries for a permit for construction of a limestone quarry in Monroe County and manufacturing plant in Mobile County, it appears that there will be no damage to the environment. It will be an economic advancement for the entire Mobile area and I believe that in view of these facts the permit should be granted as soon as possible.

Very truly yours,

Mike Perloff
MIKE PERLOFF

MP/sjm

RECEIVED
EPA-REGION IV
EIS BRANCH
ATLANTA, GA.

JUL 7 1978

C-17

DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
P. O. BOX 2288
MOBILE, ALABAMA 36628

Eubanks/rwr/FTS 534-2724

REPLY TO
ATTENTION OF:
SAMPD-EE

30 June 1978

Mr. John E. Hagan III
Chief, EIS Branch
Environmental Protection Agency
Region IV
345 Courtland St., NE
Atlanta, GA 30308

Dear Mr. Hagan:

1 As requested in your letter dated 19 May 1978, we provide the following
comments concerning the Draft Environmental Impact Statement for Ideal
Basic Industries Cement Plant and Limestone Quarry. Generally, we feel
this EIS adequately fulfills the requirements of the National Environ-
2 mental Policy Act. We would, however, like to see a discussion of the
impacts of the disposal of the dredged material associated with the
docking facilities at the plant site, as well as an alternative dis-
cussion for disposal of this 650,000 cubic yards of dredged material.

We thank you for the opportunity to review this document and look forward to further coordination on this matter.

Sincerely yours,

James B. Hildreth

JAMES B. HILDRETH
Acting Chief
Environment and Resources Branch

JUL 5 1978

FEIS.2/C-17.1
8/14/78

Response to C-17

1. Comment accepted; no response necessary.

2. Comment accepted; an in-depth analysis of the practical alternatives for the disposal of dredged material and their associated impacts is presented in Chapter VI of this FEIS.

C-18

RECEIVED
EPA/REGION IV
JUN 30 3 23 PM '78
ENFORCEMENT
DIVISION

Statement to the Environmental Protection Agency
in Behalf of Ideal Basic Industries Pland and Quarry
near Mobile, Alabama for a hearing, June 26 at 7 p.m.
in Mobile, Alabama
Glover Wilkins, Administrator
Tennessee-Tombigbee Waterway Development Authority

Thank you.

My name is Glover Wilkins. I am administrator of the Tennessee-Tombigbee Waterway Development Authority, headquartered in Columbus, Mississippi.

The Tennessee-Tombigbee Authority is a five state compact composed of Alabama, Mississippi, Tennessee, Kentucky, and Florida-the Authority is responsible for promoting development of the Tennessee-Tombigbee Waterway. In addition, the organization has been given the role of coordinating all planning activities related to the project on a multi-state basis.

The 232-mile long Tennessee-Tombigbee Waterway, running from Mobile to the Tennessee River, will tie together twelve river systems touching 23 states with a shorter, less difficult route from mid-America to the Southeastern Gulf through the Port of Mobile. It will provide a savings to shippers of more than $428 million by the year 2,000.

On behalf of the Tennessee-Tombigbee Waterway Authority, I am pleased to have this opportunity to present a statement of support in behalf of the Ideal Basic Industries proposed project at Theodore Industrial Park, Mobile, Alabama and at Monroeville, Alabama.

The anticipated environmental and socio-economic impact of Ideal's proposed projects have been carefully assessed and appropriate safeguards incorporated into those plans. The projects' plans reflect the extensive measures being taken by Ideal in accepting their environmental responsibility.

Establishment of this new hydraulic cement plant and quarry are part of the major expansions underway in the Mobile area in preparation for the anticipated traffic increase resulting from the Tennessee-Tombigbee Waterway.

Ideal's new project will be part of the growing efforts in the south to provide better jobs and higher incomes for economically disadvantaged people.

With growth generated by industrial developments such as the planned Ideal project and a total economy stimulated by the savings to shippers using the Tennessee-Tombigbee Waterway, citizens of Alabama, and much of the Southeast will have an opportunity to move up from the bottom of the economic ladder.

Mr. Chairman, my name is Wilson Gaillard, Sr. and I appear as a conservationist who long ago realized that man can not survive without industry. Therefore, while seeking to preserve habitats for wildlife, I also work to promote suitable habitats for industry, and for the industrial groth of my hometown---Mobile.

Ideal Basic Industry has met every reasonable requirement any conservationist could desire and I join the vast majority of Mobilians who proudly approve Ideal's plan for a cement plant in the Theodore Industrial Complex.

May I comment on two steps in Indeal'sproposed operation since this has caused concern among some of my fellow conservationists. The first is a problem which might result from bay breezes blowing dust from mounds of reserve limestone, causing a health hazard. But their plan to wet it with a water sprinkler system removes that problem.

Another concern was the water used to eliminate dust, might seep into the loose limestone and eventually enter Mobile Bay. Certain members were greatly concerned that the dust reducing water might sink into the ground and end up in someone's drinking water.

Personally I am not conserned about either a little limestone dust nor water which has seeped through limestone. I base my opinion on the fact that my forebears have lived on Perdue Hill for two hundred years, in the very same area from which Ideal Basic Industries will mine their raw limestone.

Many generations have cultivated those limestone plateaus and surely they were exposed to more dust than will ever blow from Ideal's stock pile of that very same limestone.

Likewise, for two hundred years my family's only water supply came from wells drilled into limestone. Yet, inspite of the farmland dust and the strong lime water, all of my forebears lived toa ripe old age.

My father was born and raised near Ideal's present limestone quarry. Farming with a mule drawn plow certainly caused more limestone dust than Ideal Basic's plant will ever create, yet, my father lived until he was 103 years old and was attending bank directors meetings two weeks before his death.

His brother was also a plantation owner in that same area and his only water was lime 'contaminated'. He lived to be 99 years old and died from 'flu' on a Florida visit.

I, too, was born in Perdue Hill and at eighty, I am still practicing dentistry. Naturally, I am convinced that Ideal Basic Industries operations in Mobile and Monroe County will present no health hazard, and so I whole heartily support their permit request.

M. W. Gaillard, DDS
323 S. Sage Ave.
Mobile, Ala., 36606

MWG/mm

C-20

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
REGION IV
101 MARIETTA TOWER, SUITE XXXX 1503
ATLANTA, GEORGIA 30323

June 28, 1978

OFFICE OF THE
Principal Regional Official

Re: HEW-870-5-78

Mr. John C. White
Regional Administrator
U. S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30308

SUBJECT: EPA 904/9-78-005 - Cement Plant, Theodore Industrial Park, Alabama and Limestone Quarry, Monroe County, Alabama

Dear Mr. White:

We have reviewed the subject draft Environmental Impact Statement. Based upon the data contained in the draft, it is our opinion that the proposed action will have only a minor impact upon the human environment within the scope of this Department's review. The impact statement has been adequately addressed for our comments.

Sincerely yours,

James E. Yarbrough TB

James E. Yarbrough
Regional Environmental Officer
DHEW-Region IV

cc: Ms. A. McGee

Mr. Raymond Goldberg

ational Waterways Conference, Inc., 1130 17th Street, N.W., Washington, D.C. 20036

C-21

June 27, 1978

Mr. John White
Regional Administrator
Environmental Protection Agency
345 Courtland Street, Northeast
Atlanta, Georgia 30308

JUN 29 1978

Dear Mr. White:

I am sorry I was unable to attend the public hearing held at the Municipal Auditorium in Mobile, Alabama, last night with reference to the request of Ideal Basic Industries, Inc., for a permit to construct a cement plant in the new Theodore Industrial Park at Mobile and to open a limstone quarry on the Alabama River in Choctaw County, Alabama. We have been following developments with respect to Ideal Basic Industries' permit request over a period of many months, and it is a pleasure to advise you that we support this request.

The National Waterways Conference, Inc., is a nationwide organization of industries utilizing water transportation, of water carriers, river valley associations, port authorities, state water boards, economic development agencies, and others joined together since 1960 to promote a greater understanding of the public benefits of the American waterways system. The Conference does not endorse particular waterways projects, nor does it have promotional ties with individual industries. However, we feel that when the wise and prudent use of efficient waterway transportation as an adjunct of industrial production affords new jobs, incomes and social opportunities at minimal cost to the environment, such use should be encouraged.

It is our understanding that an adequate environmental impact statement has been filed, and environmental regulations have been met, with regard to the proposed operations by Ideal Basic Industries on the Theodore Ship Channel, including the barging of limestone from a quarry in Choctaw County.

The particular matter under consideration by the Environmental Protection Agency at this time concerns a proposition by private investors to provide important construction materials required by the expanding Gulf Coast economy. This proposal also promises employment and development opportunities for a comparatively economically depressed area in Choctaw County. These advantages are complemented by the availability of existing inland waterway transportation facilities constructed and improved under a national policy of encouraging their utilization.

C-21

Therefore, we respectfully request that the Environmental Protection Agency weigh these circumstances and advantages favorably in considering this matter. I also request that my letter be included in the hearing record.

Sincerely yours,

Harry N. Cook

Harry N. Cook
Executive Vice President

HNC:tak

C-22

EXECUTIVE WOMEN INTERNATIONAL
MOBILE CHAPTER
P. O. BOX 2187
MOBILE, ALABAMA 36601

United States Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30308

Gentlemen:

The Mobile Chapter, Executive Women International goes on record in full support of the construction of a new cement plant by Ideal Basic Industries in the Theodore Industrial Park, in view of the environmental safeguards and measures being taken by Ideal to avoid adverse impacts on the Mobile area.

Construction and operation of this new facility would mean substantial economic benefits to the Mobile area.

The concern for a quality environment by Ideal Basic Industries is primary in our urging you to grant permitting for construction and operation at the earliest possible date.

Sincerely,

Valeria Pinson

Valeria Pinson,
President

Frances P. Fisher

Frances P. Fisher,
Secretary

/f

JUN 28 1978

C-23

BALDWIN COUNTY WILDLIFE & CONSERVATION ASSN.

BOARD OF DIRECTORS
Dick Baker
R. C. Dowdle
Cliff Eddins
Henry Little
Francis Meaher
J. I. Strickland
C. LeNoir Thompson
Donald V. Wilson

CONSERVATION PLEDGE
I GIVE MY PLEDGE AS AN AMERICAN TO SAVE AND FAITHFULLY DEFEND FROM WASTE THE NATURAL RESOURCES OF MY COUNTRY — ITS SOIL AND MINERALS, ITS FORESTS, WATERS AND WILDLIFE.

P. O. Box 359
Bay Minette, Alabama 36507

OFFICERS
C. LeNoir Thompson, President
R. C. Dowdle, Vice-President
Cliff Eddins, Chairman of the Board
Henry Little, Secretary-Treasurer
Lois Wilson and Helen McDowell, Assistant Secretaries

June 26, 1978

RECEIVED
EPA/REGION IV
JUN 28 4 25 PM '78
ENFORCEMENT
DIVISION

Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30308

Attention: Mr. Howard Zellar

Dear Sir:

Examination of the Environmental Impact Statement for Ideal Basic Industries, Cement Division, has been carefully studied. From the schooling, training and experience which I have had I feel that this company has made every effort under present day technical progress to meet the requirements of EPA and of the Coastal Zoning Board and of the Alabama Water Improvement Commissic as well as the Alabama Air Pollution Control office. My Board of Directors join me in this.

My only further comment appears that the 1200 page impact statement constituted an oversupply of "boon-dogglying". Two of the looseleaf booklets could have contained all that was necessary and the expense of this statement could have been materially reduced.

Yours very truly,

CLT/lw

Copy to: Corps of Engineer
Federal Building
Mobile, Alabama

Attention: Col. Charlie Blalock

C-24

THE INDUSTRIAL DEVELOPMENT BOARD
OF THE
CITY OF MONROEVILLE, ALABAMA

JUN 2 8 1978

June 26, 1978

The U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N. E.
Atlanta, Georgia 30308

Re: EPA 904/9-78-005
NPDES Application Numbers:
AL0028819, Limestone Quarry
Applicant: Ideal Basic Industries, In
Work: Construction and Operation of
the Limestone Quarry, Monroe
County, Alabama

Gentlemen:

The Industrial Development Board of the City of Monroeville, Alabama, respectfully submits this Statement of Support for the construction and operation of the Limestone Quarry in Monroe County, Alabama, by Ideal Basic Industries, Inc. In view of the environmental safeguards and measures being undertaken by Ideal Basic Industries, Inc. to avoid adverse and/or detrimental impacts from construction and operation of the Limestone Quarry; in view of the efforts being taken by Ideal to protect the surrounding area to the Quarry site; and, in view of the significant economic impact the project will have on Monroe County and the surrounding counties, we feel the construction and operation of this project should be approved.

The Industrial Board also wishes to express our sincere appreciation to Ideal Basic Industries, Inc., for the attitude they have shown in coming into our community and county particularly their complete openess and early communication with the community. We feel that we, in Monroe County, would be fortunate to have Ideal as an industrial citizen and urge the approval of this project.

Respectfully submitted,

ATTEST:

THE INDUSTRIAL DEVELOPMENT BOARD
OF THE CITY OF MONROEVILLE, ALA.

____
Secretary-Treasurer

By______________________________
Chairman

C-25

STATE OF ALABAMA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
P. O. BOX 188 - DAUPHIN ISLAND, ALABAMA 36528

GEORGE C. WALLACE
GOVERNOR

JOHN (TOPPY) HODNETT
COMMISSIONER

DIVISION OF MARINE RESOURCES
HUGH A. SWINGLE

June 29, 1978

Mr. John C. White
Regional Administrator
Environmental Protection Agency
345 Courtland Street, NE
Atlanta, Georgia 30308

RE: DEIS Ideal Basic Industries EPA 904/9-78-005

Dear Mr. White:

The Marine Resources Division has received the DEIS for Ideal Basic Industries, Mobile County, Alabama and has no comment. This constitutes the response of the Alabama Department of Conservation and Natural Resources.

Sincerely,

Hugh A. Swingle, Director
Marine Resources Division

cc: Mr. Edward H. Reynolds
Mr. C. E. White

HAS:sh

RECEIVED
EPA-REGION IV
E I S BRANCH
ATLANTA, GA.
JUL

ALABAMA
CHAMBER OF COMMERCE

JAMES J. BRITTON
Executive Vice President

June 22, 1978

Mr. John E. Hagan, III
Chief, E. I. S. Branch
U. S. Environmental Protection Agency
345 Courtland Street
Atlanta, Georgia 30308

Dear Mr. Hagan:

The Alabama Chamber of Commerce urges that the U. S. Environmental Protection Agency issue all necessary permits in order that Ideal Basic Industries of Mobile may proceed with the construction of its proposed Mobile plant at the earliest possible date.

We understand that Ideal Basic Industries has complied with and completed all environmental studies required by law. In addition, it will operate its proposed plant under regulations of the Environmental Protection Agency, as well as those of the State of Alabama Air and Water Pollution Control Commissions.

Under these circumstances, it is proper and in the best interest of the economy, and the people, of Mobile and the State of Alabama that the U. S. Environmental Protection Agency immediately issue the necessary permits in order that the building of this plant may proceed.

Respectfully submitted,

JAMES J. BRITTON
Executive Vice President

JJB:cma

RECEIVED
EPA-REGION IV
E I S BRANCH
ATLANTA, GA.
JUN 26 1978

468 South Perry Street ☐ P.O. Box 76 ☐ Montgomery, Alabama 36101 ☐ Telephone (205) 834-6000

C-27

1st
FIRST NATIONAL BANK
MOBILE ALABAMA

WILLIAM J. GEHLEN
PRESIDENT

June 20, 1978

Mr. John E. Hagan, III
Chief EIS Branch
Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Dear Mr. Hagan:

I regret that I will be out of town and, therefore, not able to attend the public hearing for Ideal Basic Industries Cement Plant and Limestone Quarry on Monday, June 26. I would, however, like to make a statement.

Ideal has been a good corporate citizen in Mobile for a good many years. I believe that economically Mobile and its surroundings need this project to continue its growth. I have read the draft of the environmental statement, and I believe that Ideal Basic Industries has taken every possible precaution at a considerable expense to provide for the protection of the environment. Therefore, I believe this plant will be a welcome addition to the industrial community.

Sincerely,

WJG:jm

C-28

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE
P. O. Box 311, Auburn, AL 36830

June 15, 1978

Mr. John E. Hagan III, Chief EIS Branch
Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Dear Mr. Hagan:

The draft environmental impact statement for the Ideal Basic Industries Cement Plant, Theodore Industrial Park in Mobile County, Alabama and the Limestone Quarry in Monroe County, Alabama was referred to the Soil Conservation Service on May 26, 1978, for review and comments.

SCS staff specialists reviewed the document as requested and had no comments or suggestions to offer.

We appreciate the opportunity to review and comment on the proposed project.

Sincerely,

J. H. Dent ACTING
W. B. Lingle
State Conservationist

R

JUN 19 1978

C-29

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
REGIONAL OFFICE
PERSHING POINT PLAZA, 1371 PEACHTREE STREET, N.E.
ATLANTA, GEORGIA 30309

June 1, 1978

REGION IV

IN REPLY REFER TO:

Mr. John E. Hagan III
Chief EIS Branch
Environmental Protection Agency
Region IV
345 Courtland Street, N. E.
Atlanta, Georgia 30308

Dear Mr. Hagan:

We have forwarded the Draft Environmental Impact Statement for Ideal Basic Industries Cement Plant and Limestone Quarry, Monroe County, Alabama, to the HUD Area Office in Birmingham, Alabama, for review.

Functionally the HUD Area Offices are our reviewing body for activities within their respective states. They have been advised to send their comments directly to you.

Sincerely,

Charles N. Straub

Charles N. Straub
Assistant Regional Administrator for
Community Planning and Development

AREA OFFICES
ATLANTA, GEORGIA · BIRMINGHAM, ALABAMA · COLUMBIA, SOUTH CAROLINA · GREENSBORO, NORTH CAROLINA · JACKSON, MISS
JACKSONVILLE, FLORIDA · KNOXVILLE, TENNESSEE · LOUISVILLE, KENTUCKY
Insuring Offices
Coral Gables, Florida · Memphis, Tennessee · Nashville, Tennessee · Tampa, Florida

C-30

JOHN SPARKMAN
ALABAMA
3 DIRKSEN OFFICE BUILDING

CHAIRMAN, COMMITTEE ON FOREIGN RELATIONS
COMMITTEE ON BANKING, HOUSING, AND URBAN AFFAIRS
CHAIRMAN, SUBCOMMITTEE ON HOUSING AND URBAN AFFAIRS
JOINT ECONOMIC COMMITTEE
DEMOCRATIC STEERING COMMITTEE
CHAIRMAN, SENATE BUILDING COMMISSION

United States Senate
WASHINGTON, D.C. 20510

July 6, 1978

Mr. Paul Traina
Director, Enforcement Division
U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30308
Attention: Mrs. Mona Ellison

Dear Mr. Traina:

Attached is our joint statement on the cement plant proposed by Ideal Cement Company at Theodore Industrial Park, Alabama and Limestone Quarry, Monroe County, Alabama.

We shall appreciate your consideration of it.

With kindest regards,

Sincerely,

Maryon Allen
Maryon Allen
U.S. Senator

John Sparkman
John Sparkman
U.S. Senator

Attachment

JULY 6, 1978

OFFICE OF SENATOR MARYON ALLEN
(Contact: Dick Gentry)
OFFICE OF SENATOR JOHN SPARKMAN
(Contact: Grover Smith)
WASHINGTON, D.C.

SENATORS ALLEN AND SPARKMAN SUPPORT IDEAL CEMENT PROJECT

(AL0028801 and AL0028819) (NPDES Numbers)

We urge the Environmental Protection Agency to consider favorably a proposal for the Theodore Cement Plant, Theodore Industrial Park, Mobile, Alabama, NPDES Number AL0028801 and Gaillard Quarry, near Monroeville, Monroe County, Alabama, NPDES Number AL0028819.

The cement plant is scheduled to produce hydraulic cement, while the quarry will be used to mine limestone.

We have studied the draft environmental impact statement on this project most carefully. We feel that by and large inconveniences to the environment to the two areas will be minimal. Furthermore, we feel that the boost in employment, both during the construction phase and subsequent actual operation of the plant, will constitute a meaningful economic boost to the Theodore and Monroeville areas. An average of 360 workers will will be employed during the construction of the plant with employment rising as high as 700 workers. The economic impact on the Mobile metropolitan area during construction over a two-year period will approximate 1,370 person-years of employment and $30 million in personal income.

At the Monroeville quarry site construction will generate ployment for about 200 workers over an 18-month period.

Once the two facilities are in operation it is estimated that the total employment impact will be approximately 500 jobs in Mobile County and about 44 jobs in Monroe County.

Studies by the Environmental Protection Agency indicate no violations of air quality standards and the company has indicated in considerable detail that substantial emphasis will be placed on the utilization of the latest anti-air pollution control devices. Furthermore, assurances have been given that no future alterations will be incorporated into the project unless they involve either improvement or no significant change in environmental quality.

We are especially pleased that the proposed plant at Theodore will be the largest facility of its kind ever built in a single stage in the United States. It is especially pleasing to note that more than $20 million will be spent for air and water pollution abatement.

The effects of the plant on residential areas will be minimal. The area within three miles of the plant contains only 974 dwelling units, an average density of only one dwelling unit for every 19 acres.

Naturally, we are concerned about the effects of industrialization on wildlife. We are informed that while the habitats of some wildlife will be eliminated, the impact is low because similar habitats are available in the area.

In conclusion, we offer our assurances that we are in full support of these sites. We hope that the sponsors of the project will be able to begin construction on schedule. If there is anything we can do to be helpful, please let us know.

CHAPTER VI
PROJECT MODIFICATIONS AND ADDITIONAL INFORMATION:

A. CREATION OF WETLANDS

B. DISPOSAL OF SOILS REMOVED FROM DOCKING AREA

CHAPTER VI. PROJECT MODIFICATIONS AND ADDITIONAL INFORMATION

CREATION OF WETLAND AREA

A significant modification of the Ideal Basic Industries project at Theodore has been proposed in response to concerns expressed about the preservation of the freshwater marsh. The modification will involve the creation of a new wetland area to replace the wetland lost at the access road crossing. Alternatives to the selected location for the access road and its means of construction are discussed in the DEIS.

Following a suggestion made by the U.S. Fish and Wildlife Service, Ideal Basic Industries has agreed to construct 0.6 hectares (1.5 acres) of new marsh in place of the 0.2 hectares (0.5 acres) of wetland that will be covered by fill (see Figure VI-1). The new marsh is proposed to be constructed on Ideal's property in the area which presently forms the northern boundary of the marsh system. The new marsh will be integrated with the present wetland. Its construction will involve reducing the land elevation so that reciprocal flows can occur and allow the area to revegetate naturally.

It is estimated that a lowering of land elevations to approximately one meter (3 to 3.5 feet) above sea level will be adequate to promote establishment of marsh vegetation. Ideal may employ a technique of stripping away the gently-sloping hillside in layers while leaving a berm along the margin of the existing marsh. Side slopes would not exceed a ratio of 1 to 10. Removal of all or part of the berm would constitute the last step in construction. The precise location and construction techniques employed in creating the new marsh will be determined in the final site planning process.

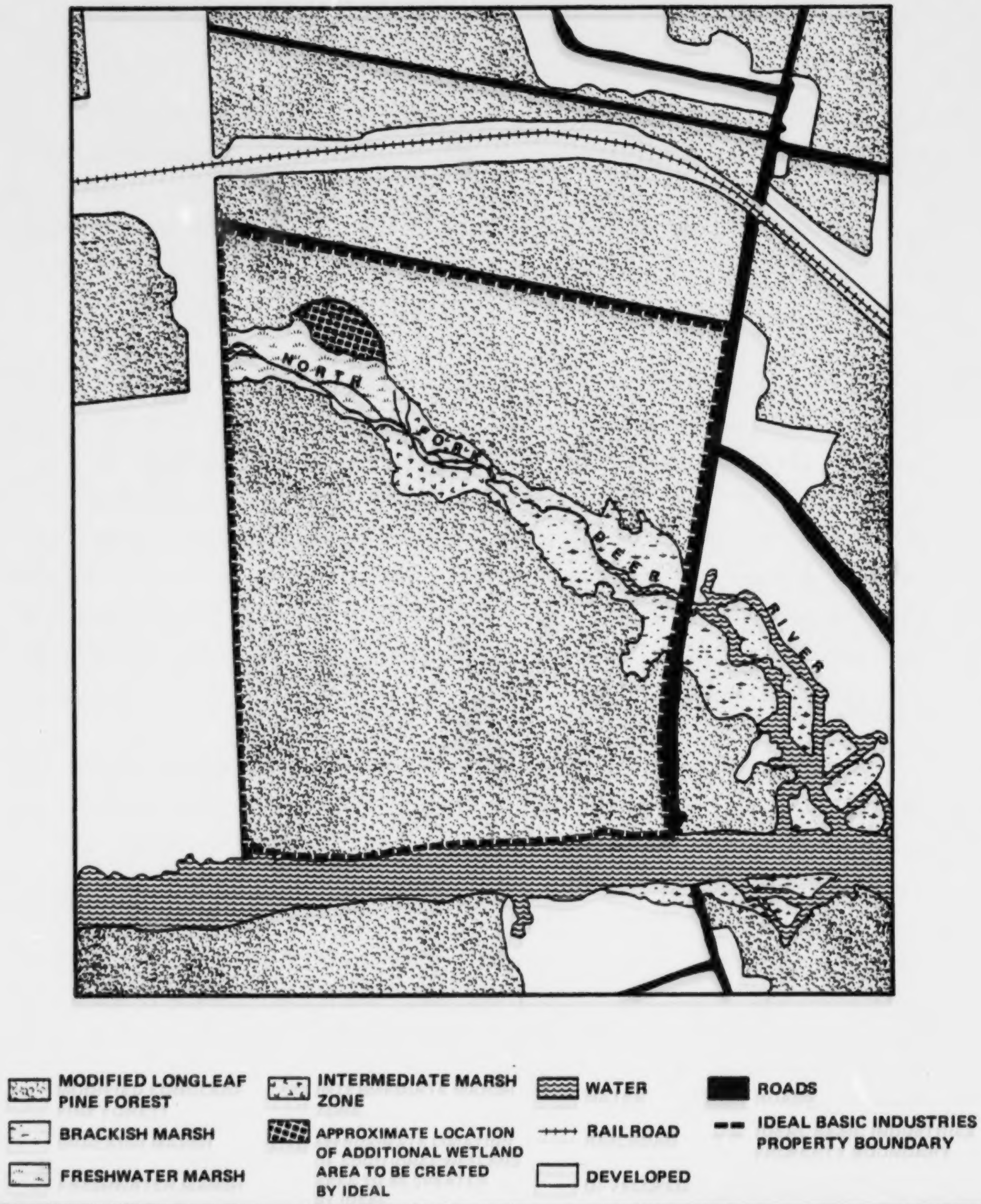

NORTH FORK DEER RIVER
MODIFIED LONGLEAF PINE FOREST
BRACKISH MARSH
FRESHWATER MARSH
INTERMEDIATE MARSH ZONE
APPROXIMATE LOCATION OF ADDITIONAL WETLAND AREA TO BE CREATED BY IDEAL
WATER
RAILROAD
DEVELOPED
ROADS
IDEAL BASIC INDUSTRIES PROPERTY BOUNDARY

Figure VI-1
VEGETATION MAP SHOWING LOCATION OF PROJECTED WETLAND AREA

0 SCALE IN METERS 300

N

SOURCE: Environmental Science and Engineering, Inc., 1978.

REGION IV
U.S. ENVIRONMENTAL PROTECTION AGENCY ENVIRONMENTAL IMPACT STATEMENT FOR IDEAL BASIC INDUSTRIES

PROPOSED CEMENT MANUFACTURING PLANT THEODORE INDUSTRIAL PARK
MOBILE, ALABAMA

DISPOSAL OF SOILS REMOVED FROM DOCKING AREA

REASONS FOR PROJECT MODIFICATION

The Ideal Basic Industries cement manufacturing plant at Theodore will include a docking facility more than 700 meters (2,300 feet) long fronting upon the Theodore Ship Channel. Part of the soil material lying between this facility and the present barge canal will be removed by the Corps of Engineers during the ship channel construction, but an additional soil volume of approximately 482,000 cubic meters (630,000 cubic yards) must be removed at Ideal's expense as part of the present project. Earlier phases of the environmental assessment have assumed that Ideal would remove this material by hydraulic dredge and convey it to one of the Corps disposal sites approved for use in the ship channel project. This operation presumably would involve the same dredging contractor and conveyance facilities as utilized by the Corps.

Such a procedure may be impractical, however, because of the timing of construction schedules. Pile-driving activity must begin on the future docking area during the early stages of the Ideal project. This activity can be conducted much more efficiently by using waterborne equipment than land equipment. It is unlikely that the Corps of Engineers' dredge will arrive at the Ideal property in time to provide the needed water access to Ideal's docking area. Alternative means of excavating and disposing at least part of the soil material must therefore be considered.

NATURE OF THE PROJECT MODIFICATION AND RELATED ACTIVITIES

For purposes of cost and flexibility, Ideal proposes to leave as much soil material as possible for removal during the ship channel dredging. Thus, the modified project plan involves excavating at an early stage the minimum soil volume necessary to provide access for construction barges to the future docking area. There will be a dry cut in the form of a trench extending parallel to the present barge canal. The berm separating this trench from the canal will then be breached at one end of the trench to yield an L-shaped water surface. The berm separating the trench from the canal will have a maximum elevation of 1.5 meters (5 feet) above sea level and will have a sea-level width of less than 30 meters (100 feet). The land cut (trench) will be excavated by using a dragline or clamshell rather than a hydraulic dredge, and will require removal of only 263,000 cubic meters (344,000 cubic yards) of soil material. The remaining 219,000 cubic meters (286,000 cubic yards) of excavation needed to provide full access to Ideal's docking area at 8.5-meter (28-foot) depth can be accomplished at any convenient future date.

Because the land cut will be excavated mechanically rather than hydraulically, the soil materials removed will contain only natural moisture. These materials can be placed on upland areas without a major dewatering process that would yield discharges to surface water bodies. The land cut will yield approximately 146,000 cubic meters (191,000 cubic yards) of soil from above mean sea level, and 117,000 cubic meters (153,000 cubic yards) from below sea level. The distinction is important because of variations in soil characteristics that could affect the available disposal options. The surficial stratum found above sea level consists primarily of loose silty sands and clayey sands, whereas the underlying stratum contains silty clays and soft gray clays. The median observed moisture content is 19 percent in the surficial stratum and 49 percent in the underlying stratum. These and other characteristics based on soil boring data are summarized in Table VI-1. The material composing the berm between the land cut and the canal is assumed to have the same average characteristics as the land cut material found below mean sea level.

The soil materials from both the surficial stratum and the underlying stratum potentially can be loaded by the dragline or clamshell onto a truck for transport elsewhere. (The cohesiveness of the underlying clays possibly could present some loading problems.) More disposal options are likely to be available for the surficial sands because of their greater value as fill material.

Table VI-1. Characteristics of Soil Materials Requiring Disposal

	Land Cut		
	Material Above Mean Sea Level	Material Below Mean Sea Level	Berm Cut
Volume of Soil Requiring Disposal:			
Cubic Meters	146,000	117,000	219,000
(Cubic Yards)	(191,000)	(153,000)	(286,000)
Soil Description	Mostly loose silty sands and clayey sands	Soft Gray clays and silty clays with organics	Soft gray clays and silty clays with organics
Grain Size; Median Percent Passing Sieve:			
#4	100%	100%	100%
#10	100%	100%	100%
#40	95%	98%	98%
#60	68%	96%	96%
#100	34%	94%	94%
#200	26%	75%	75%
Water Content Observed:			
Maximum	24%	73%	73%
Median	19%	49%	49%
Minimum	16%	28%	28%

Source: All data except grain size for material below sea level are based on borings M-1 through M-7 reported in the "Report of Geotechnical Engineering" submitted by Southern Earth Sciences, Inc., of Mobile, to Brown & Root, Inc., on July 5, 1978. Grain size data for elevations between zero and minus 8.5 meters (28 feet) are from borings VC-46-75, VC-47-75, SS-24-75, and SS-25-75 reported in the General Design Memorandum for the Theodore Ship Channel Project.

PROPOSED PROJECT ALTERNATIVES

Eleven specific locations for disposal of soil material from the Ideal docking area have been evaluated as part of the environmental review process. Many disposal strategies would involve the use of two or more of these sites. The disposal sites considered and their potential usefulness are summarized in Table VI-2 and in the following paragraphs. The locations of these sites are shown in Figure VI-2. The discussion is sufficient to demonstrate that the alternatives available to Ideal include at least some options that are economically feasible, environmentally acceptable, and capable of implementation without further action by public agencies.

EXISTING QUARRY PITS

Two existing pits in the Theodore area could be used for disposal of any soil material derived mechanically from the Ideal waterfront area. Both owners have expressed an interest in having the pits filled. The Campbell quarry is an active pit that could accommodate approximately 2.3 to 3.1 million cubic meters (3 to 4 million cubic yards) of fill. The pit owned by the John Case Construction Company could hold approximately 4.6 million cubic meters (6 million cubic yards) of material. Both pits are located approximately 19 kilometers (12 miles) from the Ideal plant waterfront via existing highways. In addition to the cost of trucking soil materials over this distance, Ideal would be responsible for maintaining the haul roads and disposal areas within the pits, and might be assessed maintenance charges for the use of Mobile County roads (e.g., Hamilton Boulevard).

Because of the capacity available in these pits, it would be feasible to dispose of the entire 482,000 cubic meters (630,000 cubic yards) of soil from the Ideal waterfront in either of the quarry pits. All of this material could be removed mechanically by a dragline or clamshell. Thus, the Ideal project at Theodore is not necessarily dependent upon any dredging activity or disposal of hydraulically dredged material.

Table VI-2. Summary of Soil Disposal Alternatives

Potential Disposal Sites	Land Cut Material		Berm Cut Material	Relative Cost per Unit Volume	Required Agency Approval †
	Above Sea Level	Below Sea Level			
Campbell Quarry Pit	X	X	X	High	None
Case Quarry Pit	X	X	X	High	None
Eastern Property:					
Natural Material	X	X	X	Medium	None
Dredged Material	X*	X*	X*	Medium	Corps
Ideal Property	(X)	X		Medium	None
Airco Property	X	(X)		Low	None
State Docks Properties:					
Parcel 1	X	X		Medium	None
Parcel 2	X	X		Medium	None
Parcel 3	X	X		Medium	None
Unspecified Sites Needing Fill	X	(X)		Low	None
Corps of Engineers Upland Disposal Site	X	X		Medium	None (site approved)
Corps of Engineers Spoil Island			X*	Low	Corps
Ocean Dumping Area		X*	X*	Medium	EPA/Corps

Notes: "X" denotes an economically viable disposal option.
"(X)" denotes a viable but unlikely option.
"X*" denotes an option involving the use of a hydraulic dredge.

† Approvals other than Section 10 permit and EIS approval.

Source: Environmental Science and Engineering, Inc, 1978.

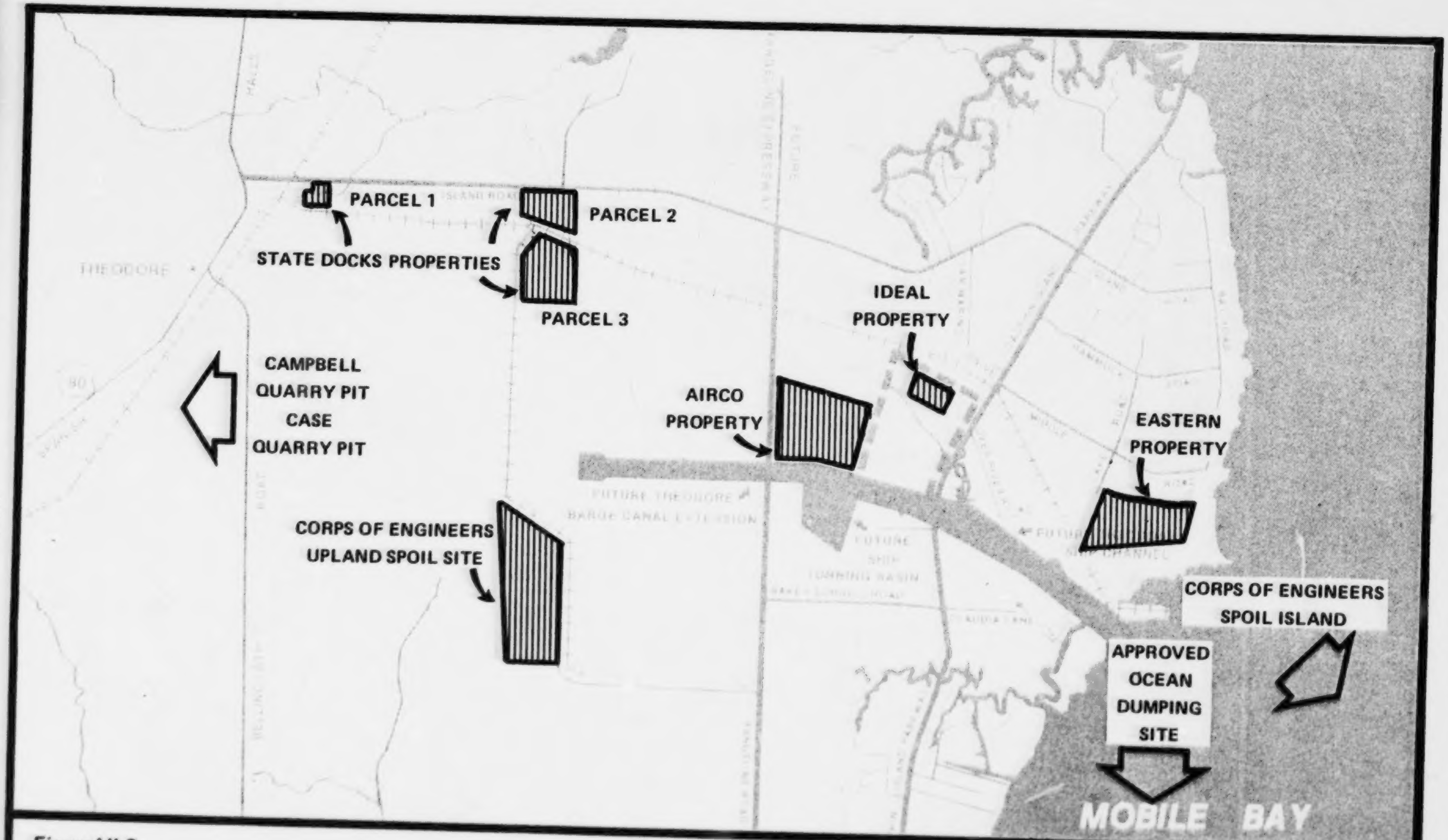

PARCEL 1
PARCEL 2
PARCEL 3
STATE DOCKS PROPERTIES
THEODORE
CAMPBELL
QUARRY PIT
CASE
QUARRY PIT
IDEAL
PROPERTY
AIRCO
PROPERTY
EASTERN
PROPERTY
FUTURE THEODORE
BARGE CANAL EXTENSION
FUTURE
SHIP
TURNING BASIN
FUTURE
SHIP CHANNEL
CORPS OF ENGINEERS
UPLAND SPOIL SITE
CORPS OF ENGINEERS
SPOIL ISLAND
APPROVED
OCEAN
DUMPING
SITE
MOBILE BAY
0 0.5 1
SCALE IN KILOMETERS
N

Figure VI-2
POSSIBLE DISPOSAL SITES FOR MATERIAL REMOVED FROM IDEAL'S WATERFRONT AREA

SOURCE: Environmental Science and Engineering, Inc., 1978.

REGION IV
U.S. ENVIRONMENTAL PROTECTION
AGENCY ENVIRONMENTAL IMPACT
STATEMENT FOR IDEAL BASIC INDUSTRIES

PROPOSED CEMENT MANUFACTURING
PLANT THEODORE INDUSTRIAL PARK
MOBILE, ALABAMA

EASTERN PROPERTY

A property exceeding 40 hectares (100 acres) on the Mobile Bay shoreline just north of the Lone Star property has been used for disposal of dredged material in the past, and could accommodate some or all of the soil from the Ideal waterfront area. The site could be used for disposal of either mechanically-excavated material, transported by truck, or dredged material brought to the site by pipeline.

IDEAL PROPERTY

The portion of the Ideal property north of the North Fork Deer River could be utilized for permanent storage of soil material from the waterfront (if the soil is excavated mechanically). A level plateau could be formed by stockpiling material between the present 1.7-meter (5.5-foot) contour and the 5-meter (16-foot) contour. This would dispose of approximately 153,000 cubic meters (200,000 cubic yards) of soil. Use of the Ideal property in this fashion would require substantial site preparation, and would probably be considered only as a last resort for disposal of the less-desirable clay materials.

AIRCO PROPERTY

Airco, Incorporated, occupies a 105-hectare (256-acre) land parcel bordering the western Ideal property boundary, and also owns a 68-hectare (167-acre) parcel to the north. Airco has expressed some interest in obtaining soil from Ideal to fill certain portions of the southern parcel. This alternative would be advantageous in that the haul would be short and would involve no public roadways. Favorable use could be made of well over 250,000 cubic meters (325,000 cubic yards) of fill material on the Airco properties, but the actual volume desired by Airco remains indefinite pending further negotiations.

CORPS OF ENGINEERS UPLAND DISPOSAL SITE

Approximately 80 hectares (200 acres) of land owned by the Alabama State Docks Department and located directly west of the Degussa Alabama, Inc., property will be made available to the Corps of Engineers for disposal of dredge material from the barge canal extension, and for disposal of material from maintenance dredging over the next 50 years. If Ideal received permission to dispose soil at this site, the material presumably would be transported by truck (over a distance of 6.4 kilometers, or 4 roadway miles) since the cost of extending the pipeline dredge to Ideal would be excessive. During the ship channel construction project, the Corps will place in the upland disposal area approximately 1,000,000 cubic meters (1,312,000 cubic yards) of material dredged from the barge canal extension. The soil material from the land cut at the Ideal waterfront would increase this volume by up to 26 percent. However, the Corps intends to utilize the upland site for future disposal of material from maintenance dredging, so that the ultimate storage will exceed one million cubic meters with or without Ideal.

THREE STATE DOCKS PROPERTIES

In addition to the site just mentioned, there are three upland properties owned by the Alabama State Docks Department which could utilize fill from the Ideal waterfront area. These sites range from 8 to 13 hectares (20 to 31 acres) in size and are located near Hamilton Boulevard west of Rangeline Road. Together, these areas would be more than adequate for disposal of all soil material from Ideal's land cut. For example, parcel 3 (the largest of the three properties) alone could accommodate approximately 200,000 cubic meters (260,000 cubic yards) of material, assuming an average fill depth of 2.44 meters (8 feet), and no filling within a 30-meter (100-foot) margin around the entire property.

CORPS OF ENGINEERS SPOIL ISLAND

Approximately 25 million cubic meters (32 million cubic yards) of material dredged from the ship channel will be deposited to form an island in Mobile Bay. The present analysis assumes that this approved disposal area will not be established soon enough to receive any of the 263,000 cubic meters (344,000 cubic yards) of materials derived from Ideal's land cut, but that the Corps spoil island could receive the 219,000 cubic meters (286,000 cubic yards) of soil remaining in the berm area. This material would add less than 1 percent to the total volume of the spoil island at the time the ship channel is completed. The spoil island will also receive most of the 1,500,000 cubic meters (2,000,000 cubic yards) of material dredged annually from the ship channel over the following 50 years. ("Supplemental Revision to Final Environmental Statement, Theodore Ship Channel and Barge Channel Extension," U.S. Army Corps of Engineers, Mobile District, March 1978.) Thus, the use of the island by Ideal for disposal of berm cut materials would subtract less than two months from the useful life of the island as presently designed.

OCEAN DUMPING

There is an approved ocean dumping site located in the Gulf of Mexico approximately 13 kilometers (8 miles) south of Dauphin Island. Material from the Ideal waterfront area potentially could be excavated and transported to this offshore site using a hopper dredge or pipeline dredge and dump scow. This process would require approvals by both EPA and the Corps of Engineers.

GENERAL EVALUATION OF ALTERNATIVES

All of these disposal alternatives are considered economically feasible, but there are significant differences in cost to Ideal. The relative costs per unit of material disposed are indicated in the fourth column of Table VI-2. The common feature of the three low-cost options (use of the spoil island, filling of the Airco property, and sale or donation to an unspecified party) is that Ideal would not be required to transport soil materials by truck for significant distances. In the case of ocean dumping and disposal of dredged material at the Eastern property, the lack of truck transportation would be offset by other costs involving Ideal's inability to coordinate with the ship channel project. Use of the northern portion of the Ideal property would require truck transport on the Dauphin Island Parkway plus construction of an access road. The two quarry pits would represent relatively high cost disposal alternatives because of the distance of travel involved.

A cost element which would be common to all of the alternatives requiring truck transport is that there is currently a weight restriction of 2,700 kilograms (6,000 pounds) per axle on the Dauphin Island Parkway bridge over North Folk Deer River. This bridge is only 12.2 meters (40 feet) long, with four supporting pillars, but it has received little maintenance since the parkway became a dead-end road in this area. Although the bridge is currently used by truck traffic to Ideal, some reinforcement might be required to accommodate the 8,500 to 35,000 truck trips in each direction that could be generated by soil disposal activity.

The two disposal strategies preferred by Ideal would each involve the utilization of multiple disposal sites. In one scenario, the soil materials derived from above sea level at Ideal's land cut would be utilized as fill on the Airco property. The soil excavated from below sea level, if not desired by Airco, would be transported to one of the quarry pits. The material comprising the berm between the land cut and the existing barge canal would be left until the Corps' dredge reached the Ideal site, at which time this soil would be dredged and pumped to the spoil island. In the other preferred scenario, all materials from Ideal's land cut would be disposed on the State Docks properties (with emphasis on Parcel 3). The berm cut materials would again go to the Corps' disposal island. As indicated by the impact assessment which is contained in the environmental evaluation section of this chapter, the environmental impacts from either of these scenarios are rated low.

BASELINE CONDITIONS AT POTENTIAL UPLAND DISPOSAL SITES

QUARRY PITS

Both the Campbell and Case quarry pits are approximately 32 hectares (80 acres) in size, with bottom elevations 9 to 15 meters (30 to 50 feet) below the original land contour. In each case the pit floor is above the permanent water table, although there may be seasonal water accumulations of up to several feet. All drainage is internal, and the quarry floor areas are unvegetated.

EASTERN PROPERTY

The existing vegetation at this site is dominated by herbaceous species generally characteristic of marshes. The area becomes periodically dry as evidenced by the invasion of woody taxa characteristic of the surrounding pineland.

The dominant herbs are cord grass (*Spartina patens*), black rush (*Juncus roemerianus*) broomsedge (*Andropogon virginicus* var. *glaucescens*), galingale (*Cyperus compressus*), bulrush (*Scipus americanus*), beak rush (*Rhynchospora* spp.), reed (*Phragmites australis*) panic grass (*Panicum repens* and *P. scoparium*), (*Carex* aff. *joorii*), eupatorium (*Eupatorium rotundifolium*), Johnson grass (*Sorghum halapense*).

On the westernmost side of the site, several woody species are invading. These include slash pine (*Pinus elliottii*), sweet bay magnolia (*Magnolia virginiana*), wax myrtle (*Myrica cerifera*), bitter gallberry (*Ilex glabra*) and groundsel (*Baccharis halimifolia* var. *angustior*).

NORTHERN PORTION OF THE IDEAL PROPERTY

The conspicuous vegetation type on this prospect is a second growth Southern longleaf pine (*Pinus palustris*) forest. The canopy is dominated almost exclusively by Southern Longleaf pine up to 8 meters in height. A shrub layer 2-3 meters in height is discernible, being characterized by bitter gallberry (*Ilex glabra*), sweet gallberry (*Ilex coriacea*), wax myrtle (*Myrica cerifera*), sweet pepperbush

(*Clethra alnifolia*), yaupon (*Ilex vomitoria*), red chokeberry (*Pyrus arbutifolia*), and occasionally horse sugar (*Symplocos tinctoria*). An herb stratum is well developed, particularly in the more open areas. The most characteristic taxa include broomsedge (*Andropogon virginicus*), panic grasses (*Panicum* spp.), beak rushes (*Rhynchospora* spp.), blackberry (*Rubus* sp.), cane (*Arundinaria tecta*), nut rush (*Scleria* sp.), eupatorium (*Eupatorium rotundifolium* and *E. recurvans*), meadow beauty (*Rhexia alifanus*), marsh-fleabane (*Pluchea foetida*), ludwigia (*Ludwigia* spp.), bracken fern (*Pteridium aquilinum*), and goldenrod (*Solidago microcephala*).

Interspersed throughout the site are seasonally flooded low areas which support mesic or hydric species. Trees include red maple (*Acer rubrum*), sweet bay magnolia (*Magnolia virginiana*), black gum (*Nyssa sylvatica* var. *biflora*) and, less commonly, water oak (*Quercus nigra*), Southern magnolia (*Magnolia grandiflora*) and swamp red bay (*Persea palustris*). Common shrubs are wax myrtle (*Myrica cerifera*), titi (*Cyrilla racemiflora*), and cliftonia (*Cliftonia monophylla*). The herbaceous component is less dense than in the surrounding pineland. The more common herbs include royal fern (*Osmunda regalis*), cinnamon fern (*Osmunda cinnamomea*), chain fern (*Woodwardia virginica*), cane (*Arundinaria tecta*), clubmoss (*Lycopodium alopecuroides*), and various grasses.

Vines are a conspicuous component of the vegetation throughout the site. Bamboo brier (*Smilax laurifolia*), greenbrier (*Smilax glauca*), poison ivy (*Toxicodendron radicans*), and muscadine grape (*Vitis rotundifolia*) are most abundant.

AIRCO SITE

The vegetation on this site is primarily disturbed Southern Longleaf Pine forest. A canal borders the eastern edge, and a small pond is located on the western portion. The presence of dead pine in the pond suggests that the pond is a relatively recent creation. This is substantiated by the presence of a few immature black gum trees (*Nyssa* *sylvatica* var. *biflora*) suggesting recent invasion. Herbs dominate the perimeter of the pond, especially wapato (*Sagittaria latifolia*) and panic grass (*Panicum repens*).

The pineland is dominated by Southern longleaf pine (*Pinus palustris*) of various age classes with some slash pine (*P. elliottii*) in lower areas. Shrubs are conspicuous though not dense. These include wax myrtle (*Myrica cerifera*), titi (*Cyrilla racemiflora*), bitter gallberry (*Ilex glabra*), and yaupon (*Ilex vomitoria*).

Scattered throughout the site are several hardwood tree species of various ages including sweet gum (*Liquidamber styraciflua*), black gum (*Nyssa sylvatica* var. *biflora*), dogwood (*Cornus florida*), spanish oak (*Quercus falcata*), live oak (*Quercus virginiana*), sweet bay magnolia (*Magnolia virginiana*), persimmon (*Diospyros virginiana*), red maple (*Acer rubrum*), and Chinese tallow (*Sapium sebiferum*). Herbs are conspicuous, represented primarily by various species of grasses (especially *Andropogon* sp. and *Panicum* spp.), blackberry (*Rubus* sp.), bracken fern (*Pteridium aquilinum*), and various composits (*Asteraceae*). The most common vines are bamboo brier (*Smilax laurifolia*) climbing over the shrubs, and climbing fern (*Lygodium japonicum*).

CORPS OF ENGINEERS UPLAND DISPOSAL SITE

The existing vegetation at this site is primarily wet pineland dominated by slash pine (*Pinus elliottii*) with a small area of sweet bay magnolia (*Magnolia virginiana*), and pond cypress (*Taxodium ascendens*) swamp on the southern portion. The site is flooded on a seasonal basis, although the presence and abundance of several hydric tree species indicate a high level of soil moisture throughout much of the year.

Structurally, the pineland is characterized by a canopy of slash pine of varying densities, an open subcanopy of hydric trees, an extremely dense shrub layer, and a sparse herb stratum. The swamp on the southern portion of the property is characterized by a dense canopy of hardwoods and pond cypress, and sparse shrub and herb layers.

The subcanopy of the pineland is dominated by sweet bay magnolia (*Magnolia virginiana*), black gum (*Nyssa sylvatica* var. *biflora*), red maple (*Acer rubrum*), water oak (*Quercus nigra*), and chinese tallow tree (*Sapium sebiferum*). These taxa are generally indicative of wet soil conditions but they exhibit tolerance to periodic dry conditions.

The shrub stratum is extremely dense. The most abundant taxa are wax myrtle (*Myrica cerifera*), cliftonia (*Cliftonia monophylla*), titi (*Cyrilla racemiflora*), and less commonly, button bush (*Cephalanthus occidentalis*), viburnum (*Viburnum* sp.), elderberry (*Sambucus canadensis*), sweet chokeberry (*Pyrus arbutifolia*), sweet pepperbush (*Clethra alnifolia*), winged sumac (*Rhus copallina*), leucothoe (*Leucothoe axillaris* var. *axillaris*), bitter gallberry (*Ilex glabra*), and sweet gallberry (*Ilex coriacea*).

The herbs do not form a continuous layer and are often localized upon organic accumulations at tree bases. Conspicuous herbs include blackberry (*Rubus* sp.), cane (*Arundinaria tecta*), chain ferns (*Woodwardia virginica* and *W. areolata*), royal fern (*Osmunda regalis*), St. John's wort (*Hypericum virginicum*), carex (*Carex* sp.), milkworts (*Polygala lutea* and *P. cruciata*), meadowbeauty (*Rhexia alifanus*), and in very wet areas, sphagnum moss (*Sphagnum* sp.).

Vines are a very conspicuous component of the vegetation, especially in areas of disturbance. Particularly abundant are bamboo brier (*Smilax laurifolia*), poison ivy (*Toxicodendron radicans*), honeysuckle (*Lonicera japonica*), pepper vine (*Ampelopsis arborea*), muscadine grape (*Vitis rotundifolia*) and rarely, cross vine (*Bignonia capreolata*).

As mentioned previously, a small sweet bay magnolia/pond cypress swamp is located on the southern portion. The closed canopy is dominated by sweet bay magnolia (*Magnolia virginiana*), pond cypress (*Taxodium ascendens*), and less commonly black gum (*Nyssa sylvatica* var. *biflora*), red maple (*Acer rubrum*), water oak (*Quercus nigra*), and emergent slash pine (*Pinus elliottii*).

The shrub layer is less dense than in the surrounding pineland although the species composition is similar. The herb stratum is less dense and exhibits a lower diversity than in the pineland. The dominant herbs are ferns, including cinnamon fern (*Osmunda cinnamomea*), royal fern (*Osmunda regalis*), chain fern (*Woodwardia areolata*), grasses (especially cane, *Arundinaria tecta*, and panic grasses, *Panicum* spp.), and sedges (*Phynchospora* spp. and *Carex* aff. *joorii*).

ALABAMA STATE DOCKS PARCEL 1

The vegetation on this site is best designated as a wet pineland, seasonally flooded. Two pine taxa dominate on this locale: the wetter, western portion is dominated by slash pine (*Pinus elliottii*) and the eastern, drier portion by Southern longleaf pine (*Pinus palustris*).

Structurally, the forest is characterized by an open canopy of pines, a well-developed shrub layer, and continuous herb stratum. Several intermittent low areas are free of woody vegetation and support plant taxa differing from the surrounding pineland.

Common shrubs include titi (*Cyrilla racemiflora*), cliftonia (*Cliftonia monophylla*), bitter gallbarry (*Ilex glabra*), shiny lyonia (*Lyonia lucida*), wax myrtle (*Myrica cerifera*), sweet gallberry (*Ilex coriacea*), blueberry (*Vaccinium* sp.), red bay (*Persea barbonia*), and occasionally winged sumac (*Rhus copallina*). Conspicuous herbs are broom-straw (*Andropogon virginicus*), clubmoss (*Lycopodium alopecuroides*), chain fern (*Woodwardia virginica*), yellow-eyed grasses (*Xyris* spp.), bloodroot (*Lacnanthes caroliniana*), beak-rushes (*Rhynchospora* spp.), St. John's wort (*Hypericum cestifolium* and *H. reductum*), milkwort (*Polygala lutea*), meadowbeauty (*Rhexia alifanus*), blackberry (*Rubus* sp.), and aster (*Aster* sp.). *Sphagnum*, a moss, is abundant in moister areas as are pipewort (*Eriocaulon* sp.), ludwigia (*Ludwigia* spp.), galingale (*Cyperus haspan*), fuirena (*Fuirena* sp.), yellow-eyed grass (*Xyris* sp.) and beak-rushes (*Rhynchospora* spp.).

The vegetation is typical of wet pinelands throughout the Coastal Plain. No permanent water bodies were observed.

ALABAMA STATE DOCKS PARCEL 2

Although located near Parcel 1, the vegetation at this site is noticeably different which reflects a slightly higher elevation and better-drained soil. Physiognomically, the forest is similar to that described for Area 1 except for a significant invasion of hardwood tree species.

The canopy is open and dominated by southern longleaf pine (*Pinus palustris*). A distinct subcanopy of hardwood species is present indicating that the forest has not burned recently. The subcanopy is composed of red bay (*Persea barbonia*), water oak (*Quercus nigra*), black gum (*Nyssa sylvatica*), and dogwood (*Cornus florida*). Less common hardwood taxa are the exotic camphor tree (*Cinnamomum camphorum*), live oak (*Quercus virginiana*), southern magnolia (*Magnolia grandiflora*), and juniper (*Juniperus silicicola*).

A shrub stratum is discernible. The dominant shrubs are wax myrtle (*Myrica cerifera*) and bitter gallberry (*Ilex glabra*). Additional shrub taxa include shiny Lyonia (*Lyonia lucida*), saw palmetto (*Serinoa repens*), sweet gallberry (*Ilex coriacea*), yaupon (*Ilex vomitoria*), and horse sugar (*Symplocos tinctoria*).

The herb layer is well-developed, especially in more open areas. Common herb taxa include bracken fern (*Pteridium aquilinum*), blackberry (*Rubus* sp.), eupatorium (*Eupatorium rotundifolium*), broom-straw (*Andropogon virginicus*), ludwigia (*Ludwigia* spp.), clubmoss (*Lycopodium alopecuroides*), cane (*Arundinaria tecta*), milkwort (*Polygala cymosa*), chain fern (*Woodwardia virginica*), yellow-eyed grass (*Xyris* sp.), and goldenrod (*Solidago microcephala*).

Several vines were observed and include Carolina jessamine (*Gelsimium sempervitrens*), muscadine grape (*Vitis rotundifolia*), and bamboo brier (*Smilax laurifolia*).

ALABAMA STATE DOCKS PARCEL 3

This site is located due south of Parcel 2. Structurally and floristically, it is similar to Parcel 2 except that a distinct subcanopy of hardwood trees is lacking. The forest is characterized by an open canopy of southern longleaf pine (*Pinus palustris*) and a well-developed shrub stratum and herb layer.

Conspicuous shrubs are bitter gallberry (*Ilex glabra*) and wax myrtle (*Myrica cerifera*). Additional shrub taxa are poison sumac (*Rhus vernix*), red bay (*Persea barbonia*), winged sumac (*Rhus copallina*), cliftonia (*Cliftonia monophylla*), sweet gallberry (*Ilex coriacea*), red chokeberry (*Pyrus arbutifolia*), and sweet pepperbush (*Clethra alnifolia*). Immature persimmon (*Diospyros virginiana*), red bay (*Persea palustris*), and occasionally black gum (*Nyssa sylvatica*) are scattered throughout the site.

Herbs are abundant, particularly in the more open areas. Several small swales or depressions are found throughout the forest. These harbor an herbaceous flora different from that of the surrounding pineland due to the more moist soil conditions. The swales are characterized by a relatively high abundance of pipewort (*Eriocaulon* sp.), yellow-eyed grasses (*Xyris* spp.), panic grass (*Panicum scoparium*), fuirena (*Fuirena* sp.), ludwigia (*Ludwigia* spp.), and milkwort (*Polygala cymosa*).

Characteristic herbs of the better-drained portions of the pineland include bracken fern (*Pteridium aquilinum*), cane (*Arundinaria tecta*), panic grasses (*Panicum* spp.), dropseed (*Sporobolus* sp.), clubmoss (*Lycopodium alopecuroides*), broom-straw (*Andropogon virginicus*), goldenrod (*Solidago* spp.), vervain (*Verbena* sp.), blackberry (*Rubus* sp.), eupatorium (*Eupatorium rotundifolium*), colic root (*Aletris lutea*), hypericum (*Hypericum cistifolium*), bloodroot (*Lacnanthes caroliniana*), beak-rushes (*Rhynchospora* spp.), and aster (*Aster* sp.).

ENVIRONMENTAL EVALUATION OF UPLAND DISPOSAL SITES

Environmental safeguards to prevent on-site and off-site impacts will be utilized by Ideal Basic Industries on any of the upland sites used for disposal of soil material from the land cut. The soil material will be layered and contoured to minimize erosion and promote rapid revegetation. Berms for stormwater retention and sediment control will be provided as necessary. An undisturbed margin will be preserved at the edge of the disposal site where there is potential for aesthetic impact or interference with adjacent land uses.

The environmental impacts associated with disposal of soil at the various sites tend to be similar and therefore are discussed together, with reference to the ratings of significance presented in Table VI-3. Four major categories of impact are considered in the table: loss of biological productivity, loss of wildlife habitat, water quality impact, and roadway usage and energy consumption. In each case, the significance ratings refer to the impacts produced by disposing a given volume of soil material at a given site.

Loss of biological productivity will have low significance as an environmental impact at most of the sites because nearly all of the forest area has been modified repeatedly by man. For the two quarry pits, the loss will be negligible since the existing productivity is near zero. However, the Eastern property is presently a highly productive wetland area, so that the impact of disposing either natural soil or dredged material in this case would be very significant. Similar ratings apply to the loss of wildlife habitat at the various sites. The significance of wildlife impact will be low in most instances because the habitat types represented are widely found in the region. Many resident wildlife species will be able to migrate to nearby areas. The Eastern property, however, provides suitable habitat for waterfowl and therefore would represent a significant loss.

Table VI-3. Probable Significance of Impacts Produced by Disposal of Soil at Potential Upland Sites

	Loss of Biological Productivity	Loss of Wildlife Habitat	Water Quality Impact	Roadway Usage and Energy Consumption
Campbell Quarry Pit	Negligible	Negligible	Negligible	High
Case Quarry Pit	Negligible	Negligible	Negligible	High
Eastern Property	High	High	Moderate	Moderate
Ideal Property	Low	Low	Low to Moderate	Low
Airco Property	Low	Low	Low to Moderate*	Low
State Docks Properties:				
Parcel 1	Low	Low	Low	Moderate
Parcel 2	Low	Low	Low	Moderate
Parcel 3	Low	Low	Low	Moderate
Corps of Engineers Upland Disposal Site	Low	Low	Low to Moderate*	Moderate

*Significance of impact will depend upon the precise placement of fill relative to existing wet areas; see text.

Source: Environmental Science and Engineering, Inc., 1978.

Disposal of soil in the two quarry pits would have negligible impacts on water quality because these areas drain internally. Use of the State Docks properties should involve minimal water quality impacts because these areas are relatively isolated from surface water bodies. (Parcels 2 and 3 are better than Parcel 1 in this regard.) The Airco property and the Corps disposal site contain some wet areas that drain actively to surface water bodies during much of the year. In the case of the Airco property, the wet areas include a series of marshes, ditches, and ponds, whereas the important wet area at the Corps disposal site consists of a small cypress swamp at the southern end of the property. The water resource impacts of soil disposal at these sites will depend on the precise placement of material, as noted in Table VI-3. The Eastern property consists almost entirely of wetland, so that any soil placement would affect water quality. Finally, the portion of the Ideal property that would be used for soil disposal does not consist of wetland, but it may be difficult to protect the valuable nearby marsh areas if this site is utilized.

The roadway usage and energy consumption required for disposal of soil materials from Ideal's land cut may constitute an important category of impact, since approximately 19,000 round trips by truck may be involved (assuming the use of trucks with 18 cubic yard capacity to transport 344,000 cubic yards of material). Either of the quarry pit alternatives could involve a total of more than 700,000 kilometers (435,000 miles) of truck travel. The other sites would require between 50,000 kilometers (31,000 miles) and 250,000 kilometers (155,000 miles) of truck travel to dispose all of the land cut material. Wear and tear of public roadways would occur in all alternatives except the use of the Airco site.

As suggested by Table VI-3, there is no disposal site that is clearly best in terms of environmental impact, although the Airco site may emerge as the best option when suitable disposal areas are ascertained through detailed field investigation. The only site that is wholly unacceptable on environmental grounds is the Eastern property.

ENVIRONMENTAL EVALUATION OF SUBMERGED DISPOSAL SITES

CORPS OF ENGINEERS SPOIL ISLAND

The environmental impacts produced by construction of the Corps of Engineers' spoil island in Mobile Bay have been documented in detail elsewhere. ("Final Environmental Statement, Theodore Ship Channel and Barge Channel Extension, Mobile Bay, Alabama," U.S. Army Corps of Engineers, Mobile District.) In summary, the island was planned so as to maintain the existing general pattern of circulation and the salinity regimen throughout the bay. Results of the model study of Mobile Bay indicate that the island will produce minor decreases in average bottom salinities at two oyster-producing areas during medium and high inflow conditions. However, a salinity wedge will be introduced in the ship channel and vicinity. The proposed plan will have very little effect on tidal heights or velocities.

The spoil island will alter slightly the visual aesthetics of Mobile Bay, and will pose navigational hazards to recreational boating. Excessive turbidity will occur during construction in an area amounting to approximately 1 percent of the total bay. This comprises the bay bottom which would be committed to island construction and that area which would be temporarily disrupted by mud flows from the island. Within this zone, phytoplankton productivity would be essentially eliminated during the two-year construction period and for an undetermined time thereafter until island stability is attained. For Mobile Bay as a whole, turbidity impacts will be minimal. Borings within the channel right-of-way have indicated that the sediment is relatively uncontaminated. Thus, significant effects on water chemistry in Mobile Bay are not anticipated.

The addition of 219,000 cubic meters (286,000 cubic yards) of soil material from Ideal's berm cut to the Corp's disposal island will contribute to these impacts, but to a very small degree. As indicated earlier, the soil from Ideal's waterfront will amount to less than 1 percent of the volume of the island at the completion of the ship channel construction, and will be equivalent to less than 15 percent of the material added during each subsequent year as a result of maintenance dredging. The use of the disposal island by industries such as Ideal has been anticipated by the Corps: "The initial dredging may also include the removal of small quantities of material for other berthing areas related to some of the industries along the inland channel." ("Supplemental Revision to the Final Environmental Statement, Theodore Ship Channel and Barge Extension," U.S. Army Corps of Engineers, Mobile District, March 1978.) Overall, the environmental impacts of this action by Ideal are judged to be insignificant.

OCEAN DUMPING SITE

The impacts produced by Ideal's use of the approved dumping site in the Gulf of Mexico cannot be assessed reliably at the present time. Utilization of this alternative would require intensive monitoring and agency review, and would be considered by Ideal only as a last resort.

APPENDIX A
CORPS OF ENGINEERS PUBLIC NOTICE ON THE PROPOSED TRESTLE AND ROADWAY BRIDGE

DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
P. O. BOX 2288
MOBILE, ALABAMA 36628

REPLY TO
ATTENTION OF:

SAMOP-S
PUBLIC NOTICE NO. AL78-00057-E (ADDENDUM)

11 July 1978

PROPOSED RAILROAD TRESTLE AND ROADWAY BRIDGE, NORTH FORK DEER RIVER, MOBILE COUNTY, ALABAMA

TO WHOM IT MAY CONCERN:

This District has received an application for a Department of the Army permit pursuant to Section 10 of the River and Harbor Act of 1899 (33 U.S.C. 403), as described below:

APPLICANT: Ideal Basic Industries
G. M. Lockhead, P.E., Chief Engineer
P. O. Box 8789
Denver, CO 80201

WATERWAY: North Fork Deer River
Mobile County, Alabama

WORK: Construct a plant access railroad trestle parallel to the west property line across the North Fork of Deer River and adjacent wetlands The 560 ft. long railroad bridge will be composed of twenty 28 ft. long spans. A small diversion channel will be required during the bridge construction period to divert runoff from upstream. Riprap or other forms of erosion protection measures will be provided for bridge piers and other areas as required. Bridge substructures will be supported by bearing piles. Also a roadway bridge will be constructed adjacent to the railroad trestle in order to provide access to the plant proper across North Fork Deer River. Two 25 ft. spans will be required. Approximately 60 C.Y. earth will be removed for the concrete casting of bridge substructures which will be supported by bearing piles. All work to be performed on the applicant's property within the Theodore Industrial Park, off Theodore Ship Channel, Mobile Bay, Mobile County, Alabama.

THIS ADDENDUM IS NECESSARY TO INCLUDE ALL WORK BEING DONE AT THE SITE, SINCE THE EIGHTH COAST GUARD DISTRICT, NEW ORLEANS, HAS DECLINED JURISDICTION OVER THE BRIDGE.

SAMOP-S 11 July 1978
PUBLIC NOTICE NO. AL78-00057-E (ADDENDUM)

Permits from State agencies, including water quality certification, if applicable, will be required before final action is taken concerning a Department of the Army Permit.

The Environmental Protection Agency has determined that an Environmental Impact Statement (EIS) is necessary. An EIS is currently being prepared for Ideal Basic Industries' entire operation, both at the Theodore Site and the Querry Site, Monroe County.

This public notice is being distributed to all known interested persons in order to assist in developing facts on which a decision by the Corps of Engineers can be based. For accuracy and completeness of the record, all data in support of or in opposition to the proposed work should be submitted in writing setting forth sufficient detail to furnish a clear understanding of the reasons for support or opposition. The decision whether to issue a permit will be based on an evaluation of the probable impact of the proposed activity on the public interest. That decision will reflect the national concern for both protection and utilization of important resources. The benefit which reasonably may be expected to accrue from the proposal must be balanced against its reasonably forseeable detriments. All factors which may be relevant to the proposal will be considered; among those are conservation, economics, aesthetics, general environmental concerns, historic values, fish and wildlife values, flood damage prevention, land use classification, navigation, recreation, water supply, water quality and, in general, the needs and welfare of the people. No permit will be granted unless its issuance is found to be in the public interest.

You are requested to communicate the information contained in this letter to any other parties whom you deem likely to have interest in the matter.

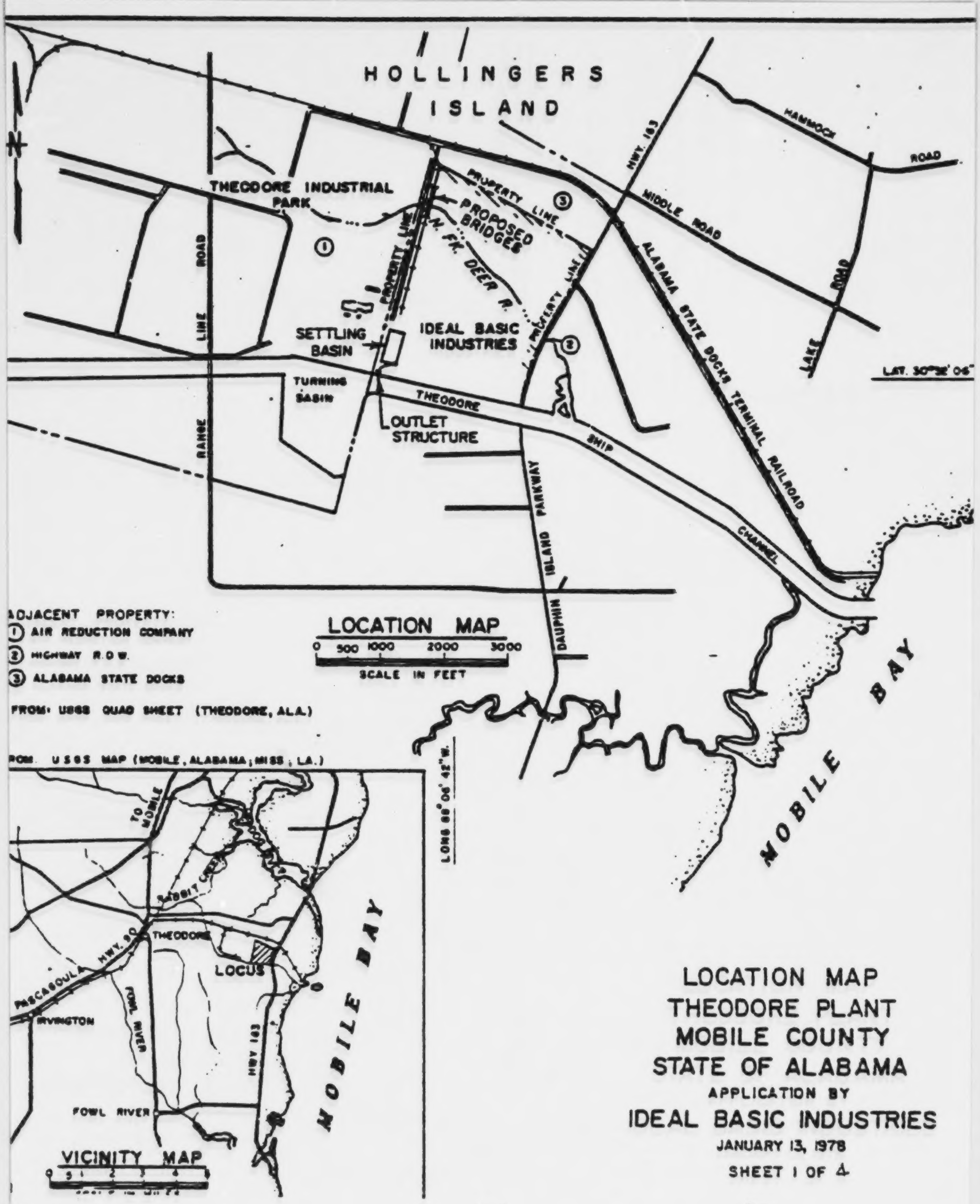
No properties listed in the National Register of Historic Places are known to be near the proposed work. The possibility exists that the proposed work may damage or destroy presently unknown archeological, scientific, prehistorical or historical sites or data. Copies of this notice are being sent to the State Archeologist, State Historical Preservation Officer and the National Park Service.

Preliminary review of this application indicates that the proposed activity will not affect listed endangered or threatened species or their critical habitat.

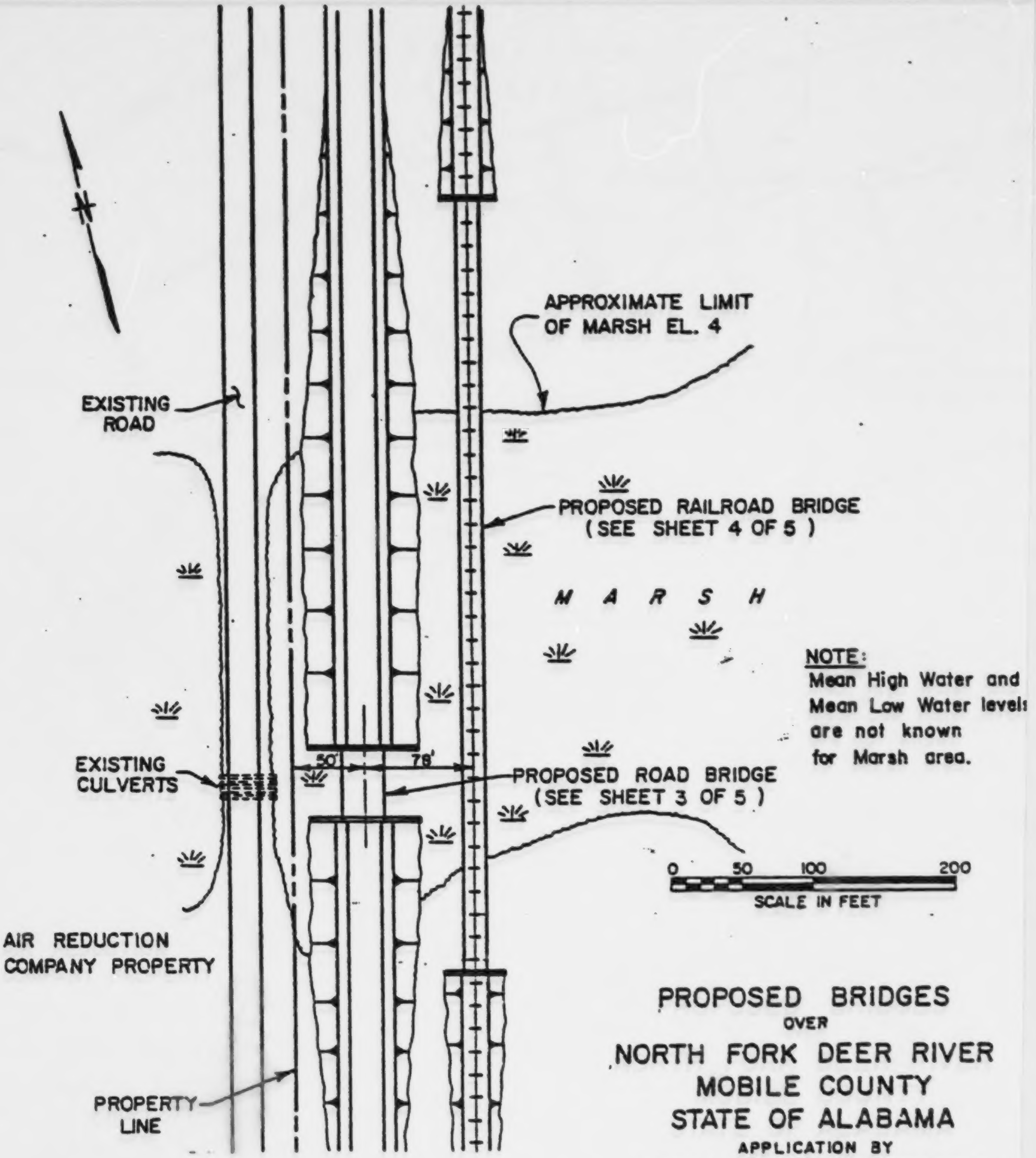
Correspondence concerning this Public Notice should refer to Public Notice No. AL78-00057-E and should be directed to the District Engineer, U. S. Army Engineer District, Mobile, Corps of Engineers, P. O. Box 2288, Mobile, Alabama 36628, ATTN: Regulatory Functions Branch, in time to be received prior to 12 August 1978.

If you have any questions concerning this application, you may contact this office, Pat Flanagan , telephone number (205) 690- 2658
Please refer to the above Public Notice number.

MOBILE DISTRICT
U. S. Army Corps of Engineers


HOLLINGERS ISLAND
THEODORE INDUSTRIAL PARK
PROPERTY LINE
PROPOSED BRIDGES
N. FK. DEER R.
HWY. 163
HAMMOCK ROAD
MIDDLE ROAD
ALABAMA STATE DOCKS TERMINAL RAILROAD
LAKE ROAD
LAT. 30°32' 06"
RANGE LINE ROAD
SETTLING BASIN
IDEAL BASIC INDUSTRIES
TURNING BASIN
OUTLET STRUCTURE
THEODORE SHIP CHANNEL
DAUPHIN ISLAND PARKWAY
MOBILE BAY
LONG 88°06' 42" W.
ADJACENT PROPERTY:
① AIR REDUCTION COMPANY
② HIGHWAY R.O.W.
③ ALABAMA STATE DOCKS
FROM: USGS QUAD SHEET (THEODORE, ALA.)
LOCATION MAP
0 500 1000 2000 3000
SCALE IN FEET
FROM: USGS MAP (MOBILE, ALABAMA; MISS., LA.)
TO MOBILE
RABBIT CREEK
THEODORE
LOCUS
PASCAGOULA HWY. 90
IRVINGTON
FOWL RIVER
HWY 163
MOBILE BAY
VICINITY MAP
0 1 2 3 4 5

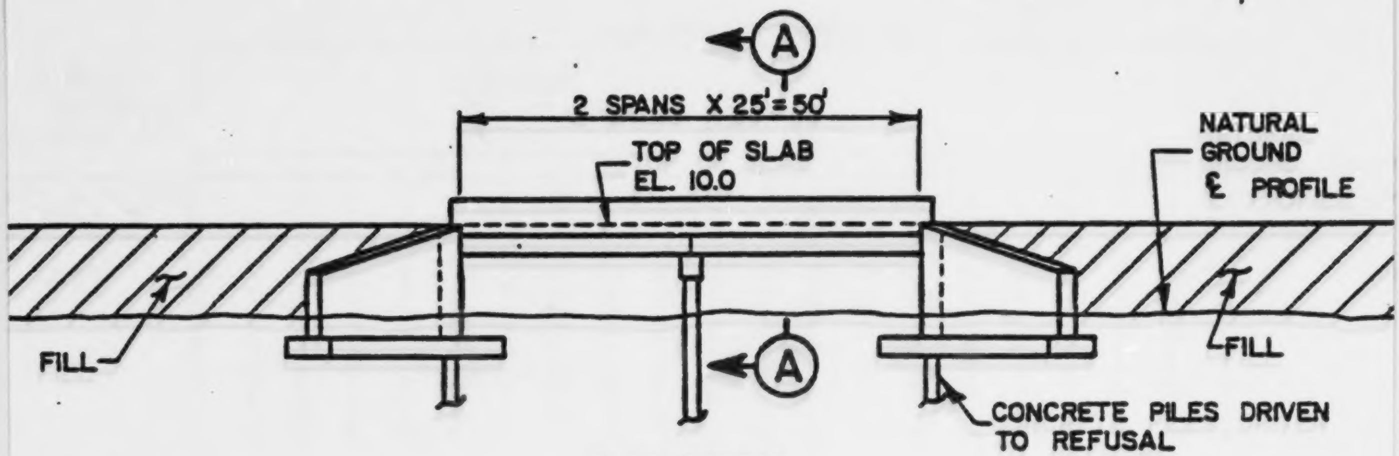
LOCATION MAP
THEODORE PLANT
MOBILE COUNTY
STATE OF ALABAMA
APPLICATION BY
IDEAL BASIC INDUSTRIES
JANUARY 13, 1978
SHEET 1 OF 4


APPROXIMATE LIMIT OF MARSH EL. 4
EXISTING ROAD
PROPOSED RAILROAD BRIDGE (SEE SHEET 4 OF 5)
MARSH
EXISTING CULVERTS
50'
78'
PROPOSED ROAD BRIDGE (SEE SHEET 3 OF 5)
0
50
100
200
SCALE IN FEET
AIR REDUCTION COMPANY PROPERTY
PROPERTY LINE

NOTE:
Mean High Water and Mean Low Water levels are not known for Marsh area.

PROPOSED BRIDGES
OVER
NORTH FORK DEER RIVER
MOBILE COUNTY
STATE OF ALABAMA
APPLICATION BY
IDEAL BASIC INDUSTRIES
JANUARY 13, 1978
SHEET 2 OF 4

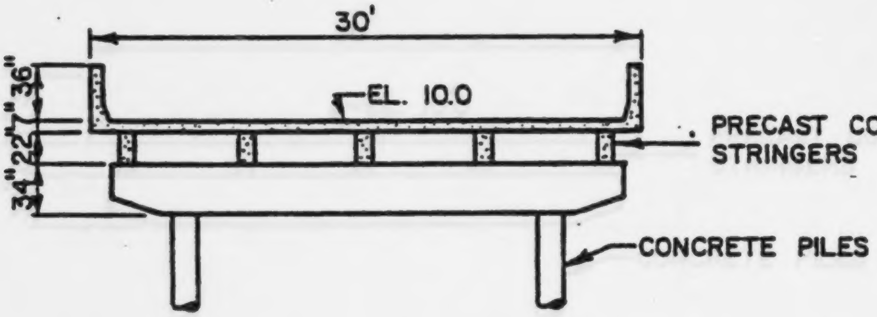
NOTE: Information presented on this drawing is preliminary and based on conceptual engineering studies not detailed design.


A
2 SPANS X 25'=50'
TOP OF SLAB
EL. 10.0
NATURAL GROUND
℄ PROFILE
FILL
FILL
A
CONCRETE PILES DRIVEN TO REFUSAL

NOTE:
Mean High Water and
Mean Low Water levels
are not known
for Marsh area.

ELEVATION

0 5 10 20 30
SCALE IN FEET


30'
36"
7"
22"
34"
EL. 10.0
PRECAST CONCRETE STRINGERS
CONCRETE PILES

SECTION A-A

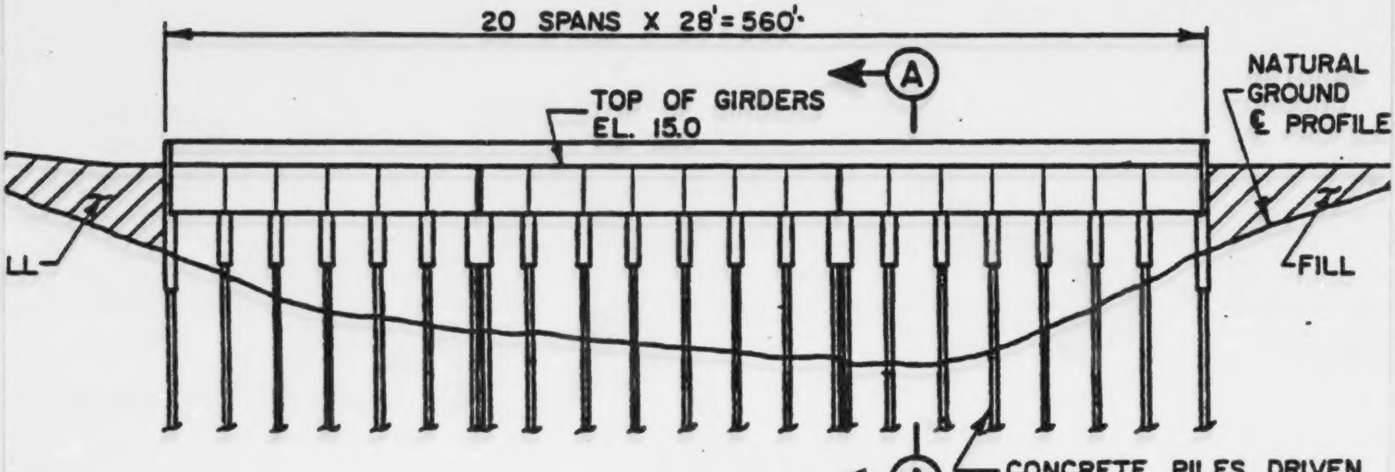
0 5 10 20
SCALE IN FEET

NOTES:

1. Elevations shown refer to Mean Sea Level.
2. Approximately 4450 cubic yards of select granular material will be used for fill.

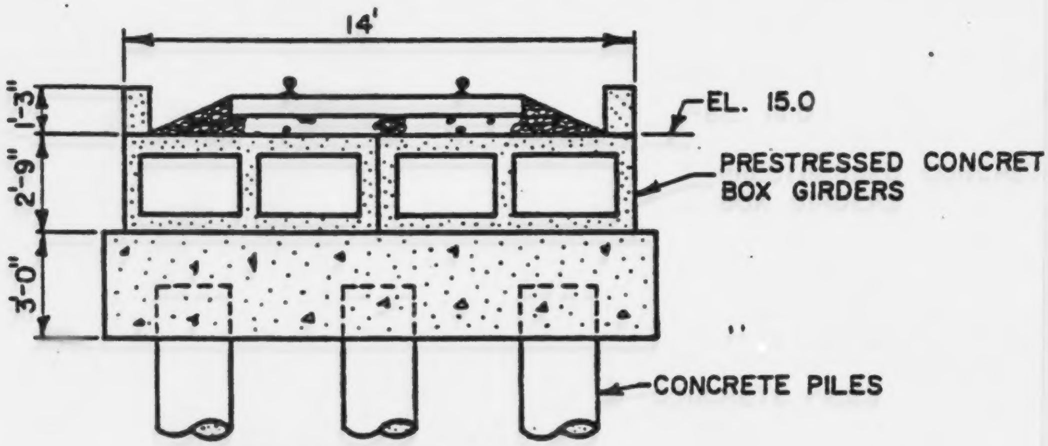
NOTE: Information presented on this drawing is preliminary and based on conceptual engineering studies not detailed design.

PROPOSED ROAD BRIDGE
OVER
NORTH FORK DEER RIVER
MOBILE COUNTY
STATE OF ALABAMA
APPLICATION BY
IDEAL BASIC INDUSTRIES
JANUARY 13, 1978
SHEET 3 OF 4


20 SPANS X 28' = 560'
A
TOP OF GIRDERS
EL. 15.0
NATURAL
GROUND
℄ PROFILE
LL
FILL
A
CONCRETE PILES DRIVEN
TO REFUSAL

NOTE:
Mean High Water and
Mean Low Water levels
are not known
for Marsh area.

ELEVATION
NOT TO SCALE


14'
1'-3"
2'-9"
3'-0"
EL. 15.0
PRESTRESSED CONCRET
BOX GIRDERS
CONCRETE PILES

SECTION A-A

0 1 2 3 4 5 10
SCALE IN FEET

NOTES:
1. Elevations shown refer to Mean Sea Level.
2. Approximately 1,100 cubic yards of select granular material will be used for fill at bridge abutments.

PROPOSED RAILROAD BRIDGE
OVER
NORTH FORK DEER RIVER
MOBILE COUNTY
STATE OF ALABAMA
APPLICATION BY
IDEAL BASIC INDUSTRIES
JANUARY 13, 1978
SHEET 4 OF 4

NOTE: Information presented on this drawing is preliminary and based on conceptual engineering studies not detailed design.

APPENDIX B
FINAL DRAFT NPDES PERMITS
(PLANT AND QUARRY SITES)

Permit No. AL0028801
Application No.

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et. seq; the "Act"),

Ideal Basic Industries
Cement Division
Theodore Cement Plant

FINAL
DRAFT

is authorized to discharge from a facility located at

Theodore Industrial Park
Theodore, Alabama

to receiving waters named

Theodore Ship Channel - Discharge 001
North Fork of the Deer River - Discharge 002

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, and III hereof.

This permit shall become effective on

This permit and the authorization to discharge shall expire at midnight,

Signed this day of

Paul J. Traina, Director
Enforcement Division

EPA Form 3320-4 (10-73)

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on effective date and lasting through the term of this permit, the permittee is authorized to discharge from outfall(s) serial number(s) 001-material stockpiles run-off, cooling tower blowdown, vehicle and floor wash wastewaters and fuel storage area dike drainage. Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations				Monitoring Requirements	
	kg/day (lbs/day)		Other Units (Specify)			
	Daily Avg	Daily Max	Daily Avg	Daily Max	Measurement Frequency	Sample Type
Flow—m³/Day (MGD)	—	—	—	—	Daily	Recorder
Total Suspended Solids shall not exceed 50 mg/l for any one (1) day					1/week	Composite

FINAL
DRAFT

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored once per week by grab sample.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): nearest accessible point after final treatment but prior to actual discharge to or mixing with the receiving waters.

FINAL
DRAFT

2. During the period beginning on effective date and lasting through the term of this permit, the permittee is authorized to discharge from outfall(s) serial number(s) 001a, fuel storage dike area only.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations				Monitoring Requirements	
	kg/day (lbs/day)		Other Units (Specify)			
	Daily Avg	Daily Max	Daily Avg	Daily Max	Measurement Frequency	Sample Type
Flow—m^3/Day (MGD)	—	—	—	—	1/month	Estimate
Oil and Grease	--	--	30 mg/1	60 mg/1	1/month	Grab

Where dike drains discharge into an oil-water separator, effluent limitations and monitoring requirements apply to the effluent from the oil-water separator. However, the discharge from dike drains shall not be subject to the monitoring and effluent requirements of the permit if all of the following are true:

1. The dike drain discharge does not go to an oil-water separator and
2. The facility has a valid SPCC Plan pursuant to 40 CFR 112 and
3. Best management practices (BMP) are used in draining the diked area. BMP is defined as use of a portable oil skimmer or similiar device or the use of abosorbent material to remove oil and grease (as indicated by the presence of a sheen) immediately prior to drainage.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): nearest accessible point after final treatment but prior to actual discharge to or mixing with all other waste waters.

FINAL DRAFT

3. During the period beginning on effective date and lasting through the term of this permit, the permittee is authorized to discharge from outfall(s) serial number(s) 002, uncontaminated storm water run-off.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations				Monitoring Requirements	
	kg/day (lbs/day)		Other Units (Specify)			
	Daily Avg	Daily Max	Daily Avg	Daily Max	Measurement Frequency	Sample Type
Flow—m^3/Day (MGD)	—	—	—	—	1/month	Estimate

Best Management Practices (BMP)

FINAL DRAFT

B. SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with the effluent limitations specified for discharges in accordance with the following schedule:

Operational Level Attained...............Effective Date of permit

New Source Discharge Requirements-

a. The permittee shall provide written notification thirty (30) days prior to commencing discharge of treated process wastewater.

b. Not less than sixty (60) days prior to the completion of the construction of the process waste abatement facility, the permittee shall provide written notification as to which time period described in Section 306(d) of the Federal Water Pollution Control Act, as amended, will be selected.

c. The permittee shall provide written notification of completion of construction of the process waste treatment facility.

2. No later than 14 calendar days following a date identified in the above schedule of compliance, the permittee shall submit either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or noncompliance. In the latter case, the notice shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

FINAL DRAFT

C. MONITORING AND REPORTING

1. *Representative Sampling*

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

2. *Reporting*

Monitoring results obtained during the previous 3 months shall be summarized for each month and reported on a Discharge Monitoring Report Form (EPA No. 3320-1), postmarked no later than the 28th day of the month following the completed reporting period. The first report is due on Dec. 31, 1981 . Duplicate signed copies of these, and all other reports required herein, shall be submitted to the Regional Administrator and the State at the following addresses:

Environmental Protection Agency
Water Enforcement Branch
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Alabama Water Improvement Commission
State Office Building
Montgomery, Alabama 36130

3. *Definitions*

a. The "daily average" discharge means the total discharge by weight during a calendar month divided by the number of days in the month that the production or commercial facility was operating. Where less than daily sampling is required by this permit, the daily average discharge shall be determined by the summation of all the measured daily discharges by weight divided by the number of days during the calendar month when the measurements were made.

b. The "daily maximum" discharge means the total discharge by weight during any calendar day.

4. *Test Procedures*

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(g) of the Act, under which such procedures may be required.

5. *Recording of Results*

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

a. The exact place, date, and time of sampling;

b. The dates the analyses were performed;

c. The person(s) who performed the analyses;

d. The analytical techniques or methods used; and

e. The results of all required analyses.

6. *Additional Monitoring by Permittee*

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Discharge Monitoring Report Form (EPA No. 3320-1). Such increased frequency shall also be indicated.

7. *Records Retention*

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recordings from continuous monitoring instrumentation shall be retained for a minimum of three (3) years, or longer if requested by the Regional Administrator or the State water pollution control agency.

FINAL
DRAFT

FINAL DRAFT

A. MANAGEMENT REQUIREMENTS

1. *Change in Discharge*

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions, production increases, or process modifications which will result in new, different, or increased discharges of pollutants must be reported by submission of a new NPDES application or, if such changes will not violate the effluent limitations specified in this permit, by notice to the permit issuing authority of such changes. Following such notice, the permit may be modified to specify and limit any pollutants not previously limited.

2. *Noncompliance Notification*

If, for any reason, the permittee does not comply with or will be unable to comply with any daily maximum effluent limitation specified in this permit, the permittee shall provide the Regional Administrator and the State with the following information, in writing, within five (5) days of becoming aware of such condition:

a. A description of the discharge and cause of noncompliance; and

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

3. *Facilities Operation*

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

4. *Adverse Impact*

The permittee shall take all reasonable steps to minimize any adverse impact to navigable waters resulting from noncompliance with any effluent limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

5. *Bypassing*

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except (i) where unavoidable to prevent loss of life or severe property damage, or (ii) where excessive storm drainage or runoff would damage any facilities necessary for compliance with the effluent limitations and prohibitions of this permit. The permittee shall promptly notify the Regional Administrator and the State in writing of each such diversion or bypass.

FINAL DRAFT

6. *Removed Substances*

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering navigable waters.

7. *Power Failures*

In order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

a. In accordance with the Schedule of Compliance contained in Part I, provide an alternative power source sufficient to operate the wastewater control facilities;

or, if such alternative power source is not in existence, and no date for its implementation appears in Part I,

b. Halt, reduce or otherwise control production and/or all discharges upon the reduction, loss, or failure of the primary source of power to the wastewater control facilities.

B. RESPONSIBILITIES

1. *Right of Entry*

The permittee shall allow the head of the State water pollution control agency, the Regional Administrator, and/or their authorized representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises where an effluent source is located or in which any records are required to be kept under the terms and conditions of this permit; and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any discharge of pollutants.

2. *Transfer of Ownership or Control*

In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Regional Administrator and the State water pollution control agency.

3. *Availability of Reports*

Except for data determined to be confidential under Section 308 of the Act, all reports prepared in accordance with the terms of this permit shall be available for public

FINAL DRAFT

inspection at the offices of the State water pollution control agency and the Regional Administrator. As required by the Act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the Act.

4. *Permit Modification*

After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

a. Violation of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. *Toxic Pollutants*

Notwithstanding Part II, B-4 above, if a toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the Act for a toxic pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic effluent standard or prohibition and the permittee so notified.

6. *Civil and Criminal Liability*

Except as provided in permit conditions on "Bypassing" (Part II, A-5) and "Power Failures" (Part II, A-7), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.

7. *Oil and Hazardous Substance Liability*

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311 of the Act.

8. *State Laws*

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation under authority preserved by Section 510 of the Act.

9. *Property Rights*

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

10. *Severability*

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

FINAL DRAFT

PART III

OTHER REQUIREMENTS

1. For the purpose of this permit, a calendar day is defined as any consecutive 24-hour period.

2. In accordance with Section 306(d) of the Federal Water Pollution Control Act (PL92-500) the standards of performance for conventional pollutants as contained in this permit shall not be made any more stringent during a ten year period beginning on the date of completion of such construction or during the period of depreciation or amortization of such facility for the purposes of section 167 or 169 (or both) of the Internal Revenue Code of 1954, whichever period ends first. The provisions of Section 306(d) do not limit the authority of the Environmental Protection Agency to modify the permit to require compliance with a toxic effluent limitation promulgated under BAT or toxic pollutant standard established under Section 307(a) of the FWPCA.

3. Control of runoff from site construction shall be consistent with sound engineering practices such as those contained in "Guidelines for Erosion and Sediment Control Planning and Implementation," EPA-R2-72-015 (August, 1972) or "Processes, Procedures and Methods to Control Pollution Resulting from all Construction Activity," EPA-430/9-73-007 (October, 1973). Prior to start of construction, the permittee shall submit to the Regional Administrator for review and approval, a detailed erosion and sediment control plan. An approved plan shall be implemented prior to start of construction.

4. Any overflow which is discharged from facilities designed, constructed and operated to treat to the applicable limitations for pH and total suspended solids, the precipitation and run-off resulting from a 10-year, 24-hour precipitation event shall not be subject to the limitations set forth in Part I, A of this permit.

Permit No. AL0028819

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et. seq; the "Act"),

Ideal Basic Industries
Cement Division
Gaillard Quarry

FINAL
DRAFT

is authorized to discharge from a facility located at

Monroe County, Alabama

to receiving waters named

Alabama River

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, and III hereof.

This permit shall become effective on

This permit and the authorization to discharge shall expire at midnight,

Signed this day of

Paul J. Traina, Director
Enforcement Division

Preceding page blank

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning on effective date and lasting through the term of this permit, the permittee is authorized to discharge from all point sources associated with active mine dewatering activities indicated on the area map (Attachment I).
Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations				Monitoring Requirements	
	kg/day (lbs/day)		Other Units (Specify)			
	Daily Avg	Daily Max	Daily Avg	Daily Max	Measurement Frequency	Sample Type
Flow—m^3/Day (MGD)	—	—	—	—	1/month	Instantaneous
Total Suspended Solids shall not exceed 30 mg/l for any one (1) day					1/month	Composite

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored once per month by grab sample.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): nearest accessible point after final treatment but prior to actual discharge to or mixing with the receiving waters.

B. SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with the effluent limitations specified for discharges in accordance with the following schedule:

   Operational Level Attained..................Effective Date of Permit

   New Source Discharge Requirements-

   a. The permittee shall provide written notification thirty (30) days prior to commencing discharge of treated wastewater.

   b. Not less than sixty (60) days prior to the completion of the construction of the waste abatement facility, the permittee shall provide written notification as to which time period described in Section 306(d) of the Federal Water Pollution Control Act, as amended, will be selected.

   c. The permittee shall provide written notification of completion of construction of the waste treatment facility.

2. No later than 14 calendar days following a date identified in the above schedule of compliance, the permittee shall submit either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or noncompliance. In the latter case, the notice shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

Reproduced from best available copy.

C. MONITORING AND REPORTING

1. *Representative Sampling*

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

2. *Reporting*

Monitoring results obtained during the previous 3 months shall be summarized for each month and reported on a Discharge Monitoring Report Form (EPA No. 3320-1), postmarked no later than the 28th day of the month following the completed reporting period. The first report is due on Dec. 31, 1979 . Duplicate signed copies of these, and all other reports required herein, shall be submitted to the Regional Administrator and the State at the following addresses:

Environmental Protection Agency
Water Enforcement Branch
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Alabama Water Improvement Commission
State Office Building
Montgomery, Alabama 36130

3. *Definitions*

a. The "daily average" discharge means the total discharge by weight during a calendar month divided by the number of days in the month that the production or commercial facility was operating. Where less than daily sampling is required by this permit, the daily average discharge shall be determined by the summation of all the measured daily discharges by weight divided by the number of days during the calendar month when the measurements were made.

b. The "daily maximum" discharge means the total discharge by weight during any calendar day.

4. *Test Procedures*

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(g) of the Act, under which such procedures may be required.

5. *Recording of Results*

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

a. The exact place, date, and time of sampling;

b. The dates the analyses were performed;

c. The person(s) who performed the analyses;

d. The analytical techniques or methods used; and

e. The results of all required analyses.

6. *Additional Monitoring by Permittee*

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Discharge Monitoring Report Form (EPA No. 3320-1). Such increased frequency shall also be indicated.

7. *Records Retention*

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recordings from continuous monitoring instrumentation shall be retained for a minimum of three (3) years, or longer if requested by the Regional Administrator or the State water pollution control agency.

A. MANAGEMENT REQUIREMENTS

1. *Change in Discharge*

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions, production increases, or process modifications which will result in new, different, or increased discharges of pollutants must be reported by submission of a new NPDES application or, if such changes will not violate the effluent limitations specified in this permit, by notice to the permit issuing authority of such changes. Following such notice, the permit may be modified to specify and limit any pollutants not previously limited.

2. *Noncompliance Notification*

If, for any reason, the permittee does not comply with or will be unable to comply with any daily maximum effluent limitation specified in this permit, the permittee shall provide the Regional Administrator and the State with the following information, in writing, within five (5) days of becoming aware of such condition:

a. A description of the discharge and cause of noncompliance; and

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

3. *Facilities Operation*

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

4. *Adverse Impact*

The permittee shall take all reasonable steps to minimize any adverse impact to navigable waters resulting from noncompliance with any effluent limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

5. *Bypassing*

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except (i) where unavoidable to prevent loss of life or severe property damage, or (ii) where excessive storm drainage or runoff would damage any facilities necessary for compliance with the effluent limitations and prohibitions of this permit. The permittee shall promptly notify the Regional Administrator and the State in writing of each such diversion or bypass.

6. *Removed Substances*

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering navigable waters.

7. *Power Failures*

In order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

a. In accordance with the Schedule of Compliance contained in Part I, provide an alternative power source sufficient to operate the wastewater control facilities;

or, if such alternative power source is not in existence, and no date for its implementation appears in Part I,

b. Halt, reduce or otherwise control production and/or all discharges upon the reduction, loss, or failure of the primary source of power to the wastewater control facilities.

B. RESPONSIBILITIES

1. *Right of Entry*

The permittee shall allow the head of the State water pollution control agency, the Regional Administrator, and/or their authorized representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises where an effluent source is located or in which any records are required to be kept under the terms and conditions of this permit; and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any discharge of pollutants.

2. *Transfer of Ownership or Control*

In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Regional Administrator and the State water pollution control agency.

3. *Availability of Reports*

Except for data determined to be confidential under Section 308 of the Act, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the State water pollution control agency and the Regional Administrator. As required by the Act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the Act.

4. *Permit Modification*

After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

a. Violation of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. *Toxic Pollutants*

Notwithstanding Part II, B-4 above, if a toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the Act for a toxic pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic effluent standard or prohibition and the permittee so notified.

6. *Civil and Criminal Liability*

Except as provided in permit conditions on "Bypassing" (Part II, A-5) and "Power Failures" (Part II, A-7), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.

7. *Oil and Hazardous Substance Liability*

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311 of the Act.

8. *State Laws*

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation under authority preserved by Section 510 of the Act.

9. *Property Rights*

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

10. *Severability*

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

PART III

OTHER REQUIREMENTS

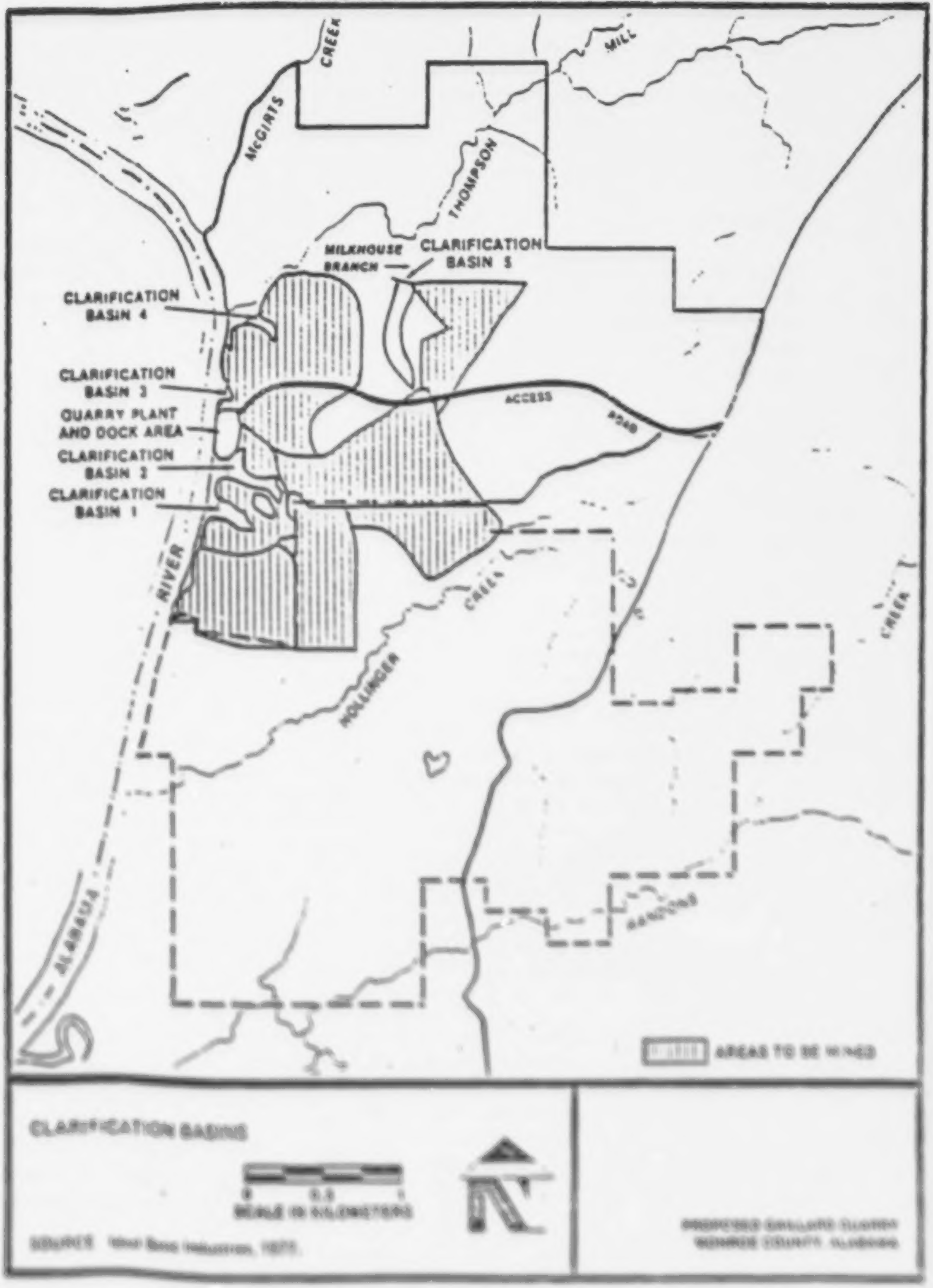
1. For the purpose of this permit, a calendar day is defined as any consecutive 24-hour period.

2. Any untreated overflow which is discharged from facilities designed, constructed and operated to contain or treat as applicable all process generated waste water and the surface runoff to the treatment facility, resulting from a 10-year, 24-hour precipitation event shall not be suject to the limitations set forth in Part I, A of this permit.

3. In accordance with Section 306(d) of the Federal Water Pollution Control Act (PL92-500) the standards of performance for conventional pollutants as contained in this permit shall not be made any more stringent during a ten year period beginning on the date of completion of such construction or during the period of depreciation or amortization of such facility for the purposes of section 167 or 169 (or both) of the Internal Revenue Code of 1954, whichever period ends first. The provisions of Section 306(d) do not limit the authority of the Environmental Protection Agency to modify the permit to require compliance with a toxic effluent limitation promulgated under BAT or toxic pollutant standard established under Section 307(a) of the FWPCA.

4. Control of runoff from site construction shall be consistent with sound engineering practices such as those contained in "Guidelines for Erosion and Sediment Control Planning and Implementation," EPA-R2-72-015 (August, 1972) or "Processes, Procedures and Methods to Control Pollution Resulting from all Construction Activity," EPA-430/9-73-007 (October, 1973). Prior to start of construction, the permittee shall submit to the Regional Administrator for review and approval, a detailed erosion and sediment control plan. An approved plan shall be implemented prior to start of construction.

ATTACHMENT I
AL0028819


CREEK
MILL
McGIRTS
THOMPSON
MILKHOUSE BRANCH
CLARIFICATION BASIN 5
CLARIFICATION BASIN 4
CLARIFICATION BASIN 3
QUARRY PLANT AND DOCK AREA
CLARIFICATION BASIN 2
CLARIFICATION BASIN 1
ACCESS ROAD
RIVER
CREEK
HOLLINGER
CREEK
ALABAMA
AREAS TO BE MINED
CLARIFICATION BASINS
0 0.5 1
SCALE IN KILOMETERS
MONROE COUNTY, ALABAMA

APPENDIX C
IDEAL BASIC INDUSTRIES
ENVIRONMENTAL PROTECTION PLAN
DURING CONSTRUCTION

ENVIRONMENTAL PROTECTION PLAN
DURING CONSTRUCTION

GULF COAST PROJECT

Ideal Basic Industries
Cement Division

May 1978

TABLE OF CONTENTS

Page

Introduction 1

Objective 2

Approach 2

Methodology 2

General Guides 3

Specific Areas 4

  Gaillard Quarry 4

  Theodore Plant Sites 8

Introduction

This is a detailed plan which will be used for protection of the environment, as mentioned in The Environmental Impact Statement, by Ideal Basic Industries during construction of its proposed plant at the Theodore site and development of the support quarry at Gaillard.

Development of this plan has followed miscellaneous suggestions from the President's Council on Environmental Quality, the Soil Conservation Service, Environmental Protection Agency publications,[1] and publications of the U.S. Army Corps of Engineers.[2]

The methodologies proposed were developed through the integration of engineering input into the environmental protection objectives desired. Brown and Root, Incorporated, engineering firm from Houston, Texas; Environmental Science and Engineering, Inc., environmental sciences firm from Gainesville, Florida; Dr. Fred Glover, environmental consultant for Ideal from Ft. Collins, Colorado and Ideal staff cooperated. Field reconnaissances of the sites were made to obtain background environmental and engineering information.

---

[1] U.S.E.P.A. 1973. Processes, procedures, and methods to control pollution resulting from all construction activity. Office of Air and Water Programs, Wash., D.C., EPA 430/9-73-007, October, Supt. of Documents, Wash., D.C.

U.S.E.P.A. 1972. Guidelines for erosion and sediment control planning and implementation. Office of Research and Monitoring, Wash., D.C., EPA-R2-72-015, August. Supt. of Documents, Wash., D.C.

[2] Dept. of Army. 1971. Environmental protection measures for construction operations. Corps of Engineers, Seattle District. March. Seattle, Washington.

Dept. of Army. 1973. Guide specifications for civil works construction. Corps of Engineers, Office of Chief of Engineers, Wash., D.C., CE 1300, June, Supt. of Documents, Wash., D.C.

Objective

To provide reasonable guidelines, suggestions, recommendations and methodologies which will lead to adequate environmental protection during the construction period.

Approach

Ideal Basic Industries wishes to assume its environmental responsibilities and will endeavor to provide protection for the natural environment. The emphasis in this plan will be toward minimizing degradation to the environment with restoration actions applied if major unavoidable damage should occur.

Methodology

Methods examined orient heavily toward controlled on site erosion, sediment, and storm water runoff including soil stabilization technologies as well as general appearance of construction site and use of efficient construction procedures. Processes utilized include site planning, evaluation, and design; engineering standards and requirements; construction planning and implementation; and vegetation protection and establishment. Procedures at Federal, State and local levels relative to the control of land disturbing activities and the inter-relationships between the environmental components were considered.

The following activities or areas of interest were used as a basis for developing the methodologies presented:

1. Structures and vegetative measures which would protect environmentally vulnerable areas;
2. Controls for the speed and volume of water runoff;
3. Detainment of stormwater on the construction site;
4. Use of water diversion structures to divert water away from disturbed, unprotected areas;

5. Trapping sediment on site;
6. Stabilizing exposed, disturbed areas;
7. Initiating revegetation of non-active disturbed areas;
8. Abating water quality degradation;
9. Providing procedures for maintenance of environmental quality; and
10. Developing guides for construction contract specifications.

General Guides

1. Off-limits lines will be established and designated on each site so as to limit disturbance to construction and construction materials storage areas only.
2. Slopes of borrow areas or soil material storage piles will be graded/dressed to blend with adjacent terrain.
3. Borrow and/or storage areas will not be located in or immediately adjacent to live streams.
4. Runoff from disturbed areas will be collected for sediment control.
5. The use of equipment in active drainages will be held to an absolute minimum and reasonable protective measures will be applied as necessary.
6. Work will be performed in a manner to minimize interference or disturbance to wildlife.
7. All work areas will be maintained free from dust that would constitute a pollution situation, hazard, or nuisance to others.
8. As much as possible, brush will be chipped and the material used for mulching.

9. Burning of brush piles will neet local requirements.
10. As much of the natural existing cover as possible will be preserved and protected.
11. Environmental protection orientation and training will be presented to field supervisors and field-oriented workers.
12. Other types of construction disturbances including noise levels will be minimized as much as practicable.

Specific Areas

Gaillard Quarry

1. Hydrologic Controls

a. The earthwork at Gaillard Quarry Process Area includes 518,300 cubic yards of excavation. Out of this amount, about 175,000 cubic yards is estimated to be overburden while the remainder is limestone. The overburden suitable for embankment construction will be utilized for the earthen embankments for the Clarification Basins. The excess and unsuitable materials will be stored in the watershed of Clarification Basin 5. Limestone usable for the manufacture of cement will be stored temporarily in the upper watershed area protected by Clarification Basin 2 until it is loaded and shipped to the manufacturing facility. These designated areas are depicted on Drawing LTG-47801. Temporary sediment control structures, as shown in Figure LTG-47803, downstream of proposed embankment locations will be provided to control sediment runoff during the construction period of the earth embankments.

b. There will be about 178,600 cubic yards of excavation and 70,400 cubic yards of fill required in the construction of the Gaillard Quarry Access Road. In order to control sediment runoff during the construction period, sediment stops similar to that shown in Figure LTG-47804 will be provided across natural drainage courses or across temporary drainage ditches along the roadway during the construction period. The sediment stops will be placed in series according to grade requirements, with width varying to suit natural ground conditions or the width of temporary ditch but not to exceed 10 feet. Mulching, grassing and/or netting with supplemental placements of straw bales may be used within the ditch areas as necessary to reduce sediment production.

c. The Gaillard Quarry Process Area will be excavated in such a manner so as to develop and maintain slopes during construction so that all storm runoff water from the area will be directed to the reservoir storage area of Clarification Basin 2 to prevent runoff from directly discharging into the Alabama River. A temporary control structure such as a timber stoplog type dam will be constructed downstream of the proposed Clarification Basin 2 earth embankment to control the sediment runoff from the process area until the earth embankment for Clarification Basin 2 is constructed. The grading plan for the quarry process area will provide for protection of the bluff area at the river by grading back slopes adjacent to the bluff.

d. Both upstream slopes and downstream slopes of Clarification Basin 1 and 2 earth-fill dams will be provided with soil-cement slope protection from wave action within the basin and floodwaters from the Alabama River. Only the upstream slope of

Clarification Basin 5 embankment will require protection with soil cement. All other cut and fill slopes will be protected with grass seeding, sodding or sprigging with mulch covering to provide additional protection until the grass becomes established.

e. Small trees may be chipped as needed and stockpiled at convenient locations for use as a protective mulch, Leaves and roots that are not suitable for mulching may be burned. Timber suitable for commercial purposes may be marketed.

2. Vegetative Protection

a. For construction area limits, see Drawing Number LTG-47801.

b. The incoming power line to Gaillard Quarry Process Area will follow the corridor of the access road.

3. Water Pollution Abatement

a. Solid Wastes--Hauled off site by contract trash carrier on a scheduled basis. Burnable trash will be burned using flame assist equipment to minimize smoke and assure complete combustion.

b. Liquid Wastes--

(1) Sanitary wastes hauled off site by licensed contract waste disposal company.

(2) Used oils will be hauled off site by used oil consumers.

(3) Wash water and wash down water will be drained to the established clarification basins for sediment removal.

4. Structural Design

a. The locations of road culverts are shown on Drawing LTG-47801. The side slope of the roadway is three (horizontal) on one (vertical), with a total surface area of 16.0 acres. The side slope of the roadway will be protected by grass seeding, sodding or sprigging with mulch covering to provide additional protection until the grass becomes established. The surface of the slopes will then be covered with mulch made of small wood chips to provide sediment control until the grass surface is established.

b. The Gaillard Quarry Access Road will consist of a two, 10-foot lane roadway with 5-foot shoulders on either side. The surface of the roadway will be treated for all weather service, and the shoulders will be constructed with stabilized granular material. The total all weather treated surface area will be about 5.1 acres and the total stabilized granular surface area will be about 2.52 acres.

5. Controlling Other Pollutants

a. Fuels will be stored at a designated fuel storage area in above ground storage tanks. An embankment will surround the tank area and will be high enough to contain the volume of stored fuel.

6. Schedule of Disturbed Lands (see attached chart)

Access Road	36.4 acres
Plantsite	12.9 acres
Office and Material Storage Area (temp)	7.0 acres
Dam Areas	18.4 acres

Theodore Plant Site

1. Hydrologic Controls

a. A catchment area will be provided north of the plant facility to serve as a general plant runoff storm water settling basin. Storm runoff from the plant area will be collected in this catchment area to settle out suspended sediment in the storm water and to reduce peak discharges and to distribute flows into the North Fork Deer River and adjacent wetland area.

The catchment area will be formed by two detention basins with earth berms. These earth berms will be sodded with grass to protect them from erosion. Multiple 12-inch diameter concrete pipes will be provided to drain water from upper basin to the lower basin. The height of berms will be about 3.3 feet and the length will vary from 2550 feet to 2720 feet. A section of earth berm, 300 feet long, will be utilized as an overflow weir for releasing storm water to North Fork Deer River, and a 12" diameter concrete pipe will be provided for draining the catchment area. The total earthwork of these berms will be about 9,000 cubic yards and all construction will be at or above the limit of wetland marsh area.

The berms will be constructed by placement and compaction of a portion of the earth material produced by excavation from plant grading which is suitable for embankment construction. Minimum clearing along the proposed berm alignments is being planned. The ponding area will not be cleared in order to reduce the disturbed area to a minimum, and to take advantage of the sediment control which the native vegetation will provide.

b. All runoff from fill material and mulch storage areas in the plant area will be collected in nearby temporary depressions and/or diverted by temporary ditches to the bermed water storage area north of the plant.

c. Small trees may be chipped as needed and stockpiled at convenient locations for use as protective mulch. Leaves, roots and bushes not suitable for mulching, and larger trees not suitable for commercial timber, will be burned at site in accordance with burning permit requirements.

2. Vegetative Protection

a. For limits of restricted area, see Drawing LTG-47800.

b. The marsh at the north end of the limestone stockpile will be protected. A sheet pile retaining wall will be constructed in this area to form a well defined limit of the plant fill. A perimeter ditch will be provided to collect drainage and prevent runoff directly to the marsh at this location.

c. A minimum corridor to accommodate necessary traffic of construction vehicles will be established by Ideal. All vehicles and equipment will then stay within this corridor to avoid any unnecessary disturbance of additional areas. Timber mats will be provided for the marsh area large enough for heavy equipment to drive foundation piles for roadway bridge and railroad bridge. Any material removed for installation of piles will be placed outside the marsh area to minimize sediment production and unnecessary turbidity to marsh waters.

3. Water Pollution Abatement

a. The runoff from the temporary parking lot during construction will be diverted to temporary collection areas and thence to the bermed water storage area north of the plant.

b. If required, storm water runoff controls such as diversion structures, berms and sediment traps will be provided for the designated inactive construction material storage area. However, due to the infrequent usage requirements, and minimal land disturbance associated with this storage area, the need for runoff controls are not anticipated.

c. Solid Wastes--Hauled off site by contract trash carrier on a scheduled basis. Burnable trash will be burned using flame assist equipment to minimize smoke and assure complete combustion.

d. Liquid Wastes--

(1) Sanitary wastes hauled off site by licensed contract waste disposal company.

(2) Used oils will be hauled off site by used oil consumers.

(3) Wash water and wash down water will be contained within an embankment and allowed to settle out.

4. Structural Design

a. The temporary entrance road at the S.E. corner of property will be a two, 8-foot lane stabilized granular surface road. The length of the road is about 330 feet with a total road surface area of approximately 0.15 acre. A concrete pipe culvert will be provided at Dauphin Island Parkway for storm water drainage. Mulching, sprigging or seeding of exposed surfaces will be provided as required for sediment control until native cover is established.

b. All cut and fill slopes for access road and railroad will be protected by grass sprigging with mulch covering as earthwork progresses to provide sediment control until the grass surface is established.

c. Sediment stops similar to that shown in Figure LTG-47804 will be provided across natural drainage courses or across temporary drainage ditches along the roadway as required. The sediment stops will be placed in series according to grade requirements with width varying to suit natural ground conditions or the width of the temporary ditch, but not to exceed 10 feet. Mulching, grassing and/or netting with supplemental placement of straw bales may be used as necessary within the ditch areas to reduce sediment production.

d. The plant water supply line will be brought in at about 15 feet east and parallel to the west property line. A 2.5 feet deep trench will be excavated to accommodate the pipeline and will be backfilled as soon as the pipeline pressure test is completed. No trenching will be performed in the marsh area. If the access road bridge is complete, the water line will be suspended from the bridge. Otherwise, a temporary line will be laid across the marsh near the existing fence line until the bridge is completed.

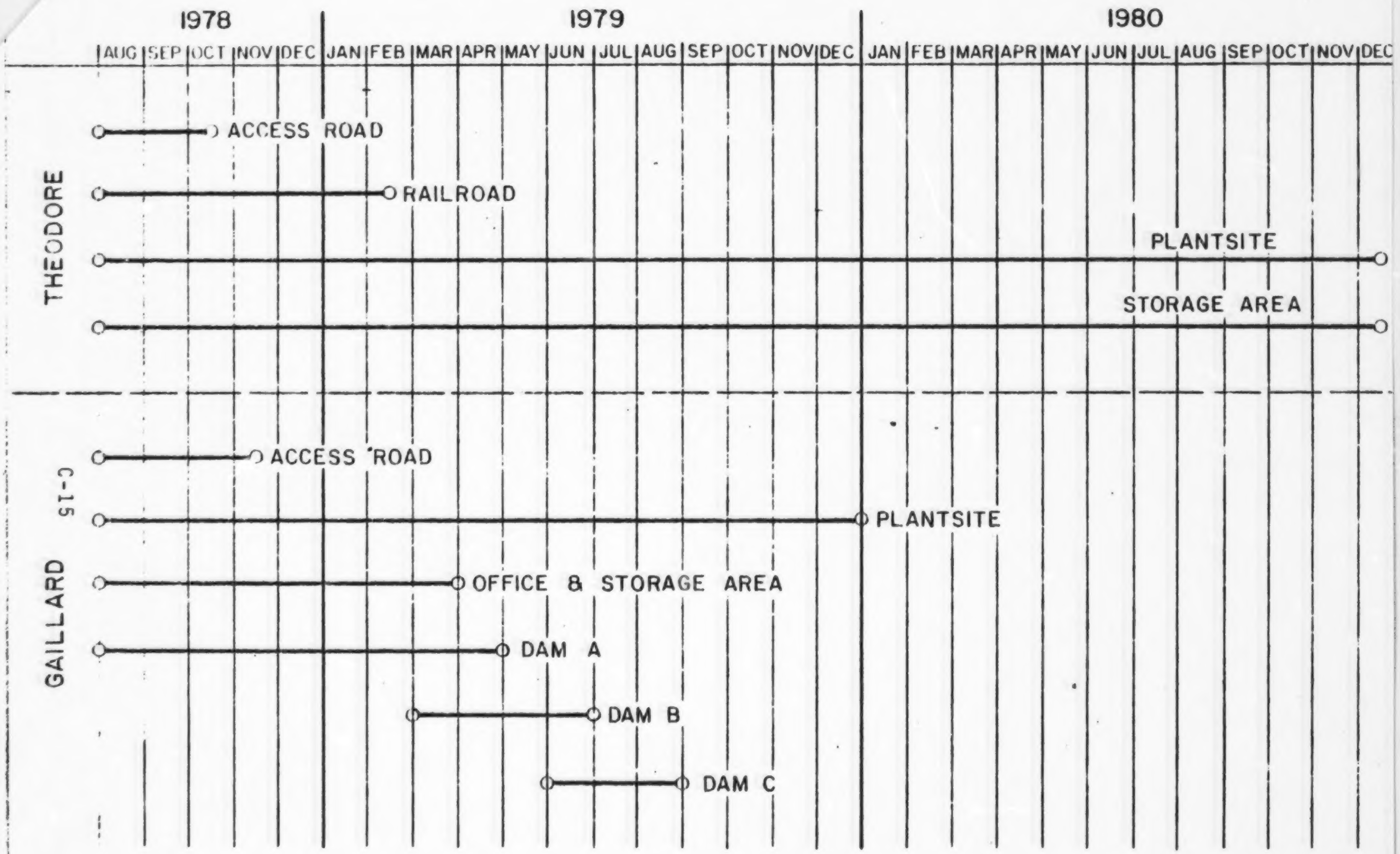
5. Controlling Other Pollutants

a. Fuels will be stored at a designated fuel storage area in above ground storage tanks. An embankment will surround the tank area and will be high enough to contain the volume of stored fuel.

b. To reduce noise of pile driving equipment, piling may be installed by drilling or jetting holes to whatever depth can be accomplished without caving of the hole. The driving leads will be wrapped in a sound deadening material to further reduce hammer noise. Piles will be driven the remaining non-drilled depth.

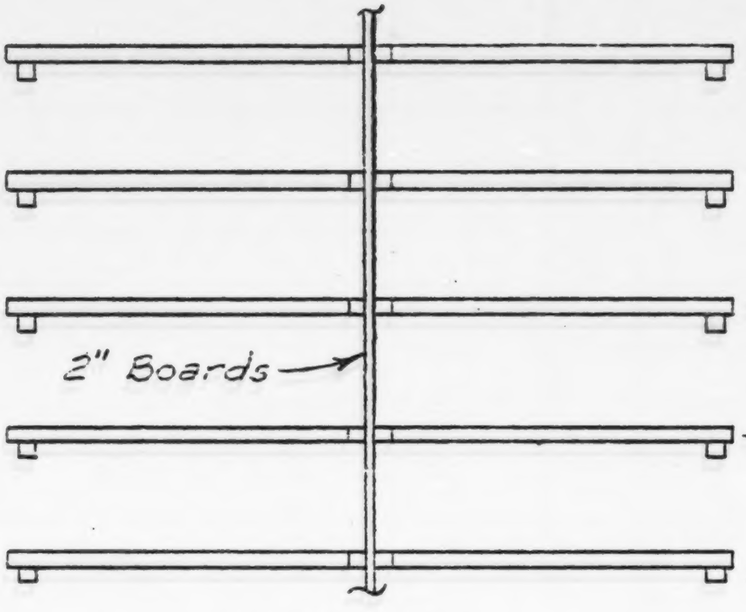
6. Schedule of Disturbed Lands

Access Road and Rail Road	17.4 acres
Active Storage Area	7.4 acres
Inactive Storage Area	9.0 acres
Plant Site	65.0 acres
Water Retention Berms	8.9 acres
Temporary Entrance Road	0.15 acres

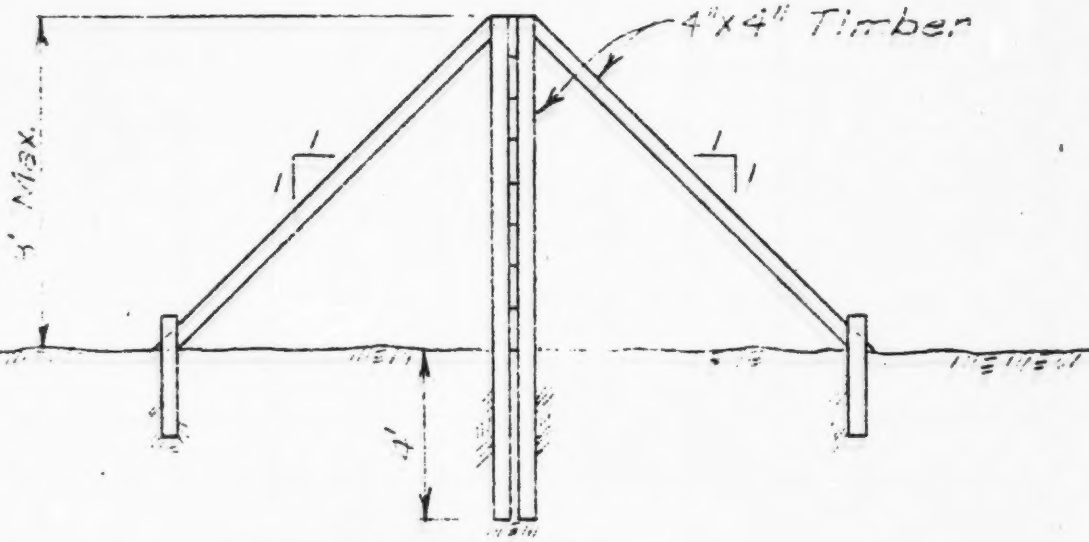


DISTURBED AREAS AS A FUNCTION OF TIME

LTG-47802


2" Boards
3' (Typ.)

PLAN


4"x4" Timber
3' Max.
1
1
1
1
3'

SECTION

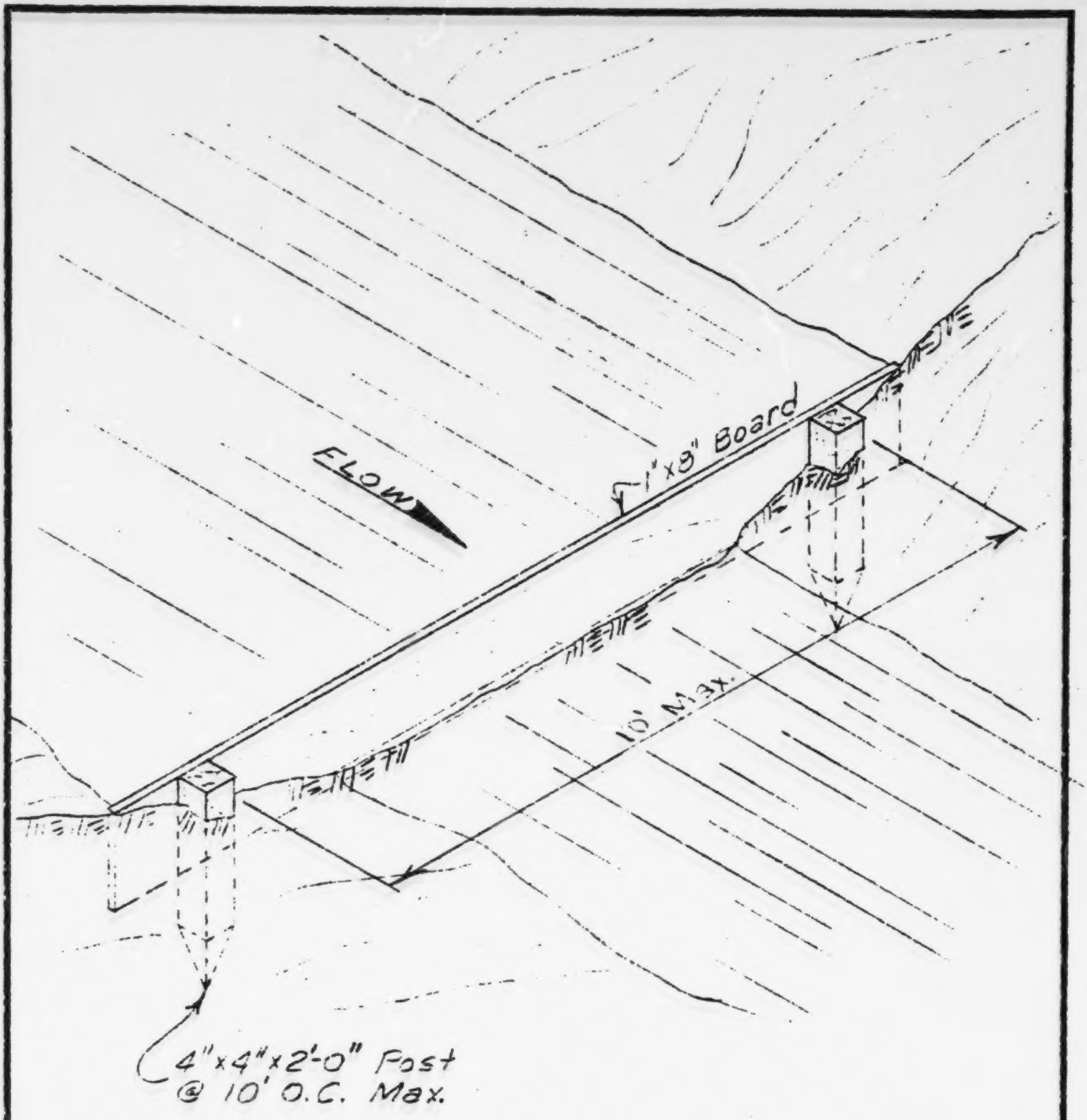
BROWN & ROOT Inc. HOUSTON, TEXAS

CONT. NO.

ENVIRONMENTAL PROTECTION CONSTRUCTION PLAN
TEMPORARY SEDIMENT CONTROL STRUCTURE

DWG. NO.
LTG-47803

DRAWN BY ______ CHECKED ______ APPROVED ______ DATE ______ SHT ______ OF ______


1"x8" Board
FLOW
10' Max.
4"x4"x2'-0" Post
@ 10' O.C. Max.

BROWN & ROOT Inc. HOUSTON-TEXAS

CONT. NO.

ENVIRONMENTAL PROTECTION CONSTRUCTION PLAN
TYPICAL SEDIMENT STOP

DWG. NO.
LTG-47804

DRAWN BY ______ CHECKED ______ APPROVED ______ DATE ______ SHT ______ OF ______

APPENDIX D
LETTER FROM IDEAL BASIC INDUSTRIES CONCERNING CREATION OF A WETLAND AREA

Cement Division

Ideal Plaza—950 17th Street
P.O. Box 8789
Denver, Colorado 80201

303 623 5661

IDEAL

August 14, 1978

Ms. P. A. Flanagan
Department of the Army
Mobile District Corps of Engineers
P. O. Box 2288
Mobile, Alabama 36628

Subject: Draft Environmental Impact Statement
Proposed Theodore Cement Plant &
Public Notice No. AL78-00057-E

Dear Ms. Flanagan:

This is to confirm the agreement that was made between Ideal Basic Industries, the Department of the Army and the United States Department of the Interior concerning wetland fill at the site of the proposed new Theodore cement plant near Mobile, Alabama.

On August 1, 1978, a meeting was held at the office of the Mobile District Corps of Engineers to discuss the letter of July 7, 1978, from the U. S. Department of the Interior to the U. S. Environmental Protection Agency, Region IV, commenting on the Draft Environmental Impact Statement prepared for Ideal Basic Industries' proposed new Theodore cement plant and supporting limestone quarry. The following persons were present at this meeting:

Ms. P. A. Flanagan - Mobile District U. S. Army Corps of Engineers
Mr. D. N. Bush - U. S. Dept. of the Interior, Fish and Wildlife Service
Mr. R. A. Baker - Environmental Science and Engineering, Inc.
Dr. T. R. Hammer - Environmental Science and Engineering, Inc.
Mr. J. E. Bear - Brown & Root, Inc.
Mr. R. J. Castelli - Ideal Basic Industries
Mr. H. W. Powledge - Ideal Basic Industries

From a general discussion of the comments contained in the Department of Interior's letter, it was concluded that, with the exception of the plant access road crossing of the North Fork Deer River, all indicated environmental concerns have been adequately addressed in the Draft Environmental Impact Statement.

In response to the suggested trestling of the access road across the wetlands of the North Fork Deer River, Ideal Basic Industries explained that the proposed roadway fill and bridge crossing would result in the loss of only about 0.5 acres of wetland area. The cost of this method of construction has been estimated to be less than one-fourth that of a trestle crossing. In view of the economics involved, it was agreed that the proposed roadway fill and bridge would be accepted as the most feasible method for crossing the North Fork Deer River and adjacent wetland areas.

It was further agreed that governmental approval would be given for the 0.5 acres wetland fill required for construction of the plant access road and that Ideal Basic Industries would compensate for the existing wetland area loss by creating a nearby wetland area of approximately 1.5 acres.

Sincerely,

IDEAL BASIC INDUSTRIES
CEMENT DIVISION

Harlan W. Powledge

Harlan W. Powledge
Head Civil Engineer

Powledge/kjw
cc: U. S. Dept. of Interior
U. S. E.P.A.
A.W.I.C.
State Docks
Alston, Miller & Gaines
E.S.&E.
Brown & Root

APPENDIX E
ALABAMA AIR POLLUTION CONTROL COMMISSION PERMIT TO CONSTRUCT (QUARRY SITE)

STATE OF ALABAMA
AIR POLLUTION CONTROL COMMISSION

PERMIT TO CONSTRUCT

(Section 1.12.1, Alabama Air Pollution Control Rules and Regulations)

Issued to : IDEAL BASIC INDUSTRIES

Location : MONROEVILLE

Permit Number	Description of Source
1-06-0013-X001	Two (2) Limestone Crushers and Conveying System with Water Sprays and Enclosed Conveyor Transfer Points - 2150 TPH of Limestone
1-06-0013-X002	Barge Loading System with Retractable Loading Spout - 2150 TPH of Limestone

This Permit to Construct is issued pursuant to the provision of Section 18 of the Alabama Air Pollution Control Act of 1971, Act No. 769 (Regular Session, 1971), and Part 1.12 of the Alabama Air Pollution Control Rules and Regulations in accordance with the application filed with the Commission, and subject to the conditions appended hereto, both of which are considered a part of this permit. This permit shall be subject to all applicable laws of the State of Alabama and Rules, Regulations, and Orders of the Commission or the Director, and shall be effective from the date of issuance.

This Permit is to be kept under file or on display at all times at the location described above and is to be made readily available for inspection by any and all persons who may request to see it.

Date of issuance July 7, 1978

Page 1 of 2 pages

Director
Alabama Air Pollution Control Commission

Permit Nos. 106-0013-X001
106-0013-X002

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such Rules.

2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.

3. This permit expires and the application is cancelled if construction has not begun within 18 months of the date of issuance of the permit.

4. On completion of construction of the device for which this permit is issued, notification of the fact is to be given to the Director within 10 days.

5. The device for which this permit is issued may not be operated until a Permit to Operate is obtained from the Director.

6. Within 30 days of the date that contracts are awarded for the purchase of major process and air pollution control equipment, written notification of the fact is to be given to the Director.

7. Within 30 days of the date that construction of the major process equipment is initiated, written notification of the fact is to be given to the Director.

APPENDIX F
LETTERS FROM STATE HISTORICAL PRESERVATION OFFICER

AUG 02 1978

Mr. Milo B. Howard Jr.
Alabama Historical Commission
725 Monroe Street
Montgomery, AL 36104

Dear Mr. Howard:

On June 26, 1978 a public hearing was conducted for the Ideal Basic Industries draft environmental impact statement, NPDES water discharge permit and the air quality PSD approval to construct. At this hearing Mr. Gregory Spiss, commented on his concern that EPA had not complied with the law by contacting the Department of Interior for a determination on the eligibility of any identified sites for the National Register.

After the hearing I requested the assistance of Dr. Bennie Keel with the office of Historic, Cultural, Recreational Services to assure that EPA has complied with the law. He suggested that I first provide you with the data from the archeological survey conducted by Dr. Stowe and obtain a letter from you indicating your opinion whether the sites identified at the Monroe County quarry site are eligible for the National Register of Historic Places. I also need a letter verifying that you are satisfied with the survey conducted at the Theodore Plant Site and that no significant sites are going to be impacted by construction.

I realize that you have already seen the archeological report and have provided similar letters to Environmental Science and Engineering but according to Dr. Keel the state and the responsible agency must concur on the significance of impacts on potential archeological sites.

The letter giving your opinion on the eligibility of significant archeological sites for the National Register at both the plant site and quarry site will help expedite the completion of our final environmental impact statement. Your assistance will be appreciated.

Sincerely,

Reproduced from
best available copy.

Russell L. Todd

Russell L. Todd, Ph.D.
EIS Project Officer

Enclosure

cc: Dr. Bennie Keel
RLT;sdf;8-2-78

STATE OF ALABAMA
ALABAMA HISTORICAL COMMISSION
725 MONROE STREET
MONTGOMERY, ALABAMA 36104

W WARNER FLOYD
EXECUTIVE DIRECTOR

TELEPHONE NUMBER
832-6621

August 15, 1978

Mr. John C. White
Regional Administrator
Environmental Protection Agency
EIS Branch
345 Courtland Street, N. E.
Atlanta, GA 30308

Dear Mr. White:

Based on documented reports prepared by Professional Archaeologist Noel Read Stowe, the Alabama Historical Commission, state historic preservation office, concurs that the development of Theodore Industrial Park Plant Site, Mobile County, Alabama, will not effect any archaeological, historical, or architectural resources.

Sincerely,

W. Warner Floyd
W. Warner Floyd

APPROVED:

Milo B. Howard, Jr.
Milo B. Howard, Jr.
State Historic Preservation Officer

RECEIVED
EPA-REGION IV
EIS BRANCH
AUG 18 1978

STATE OF ALABAMA
ALABAMA HISTORICAL COMMISSION
725 MONROE STREET
MONTGOMERY, ALABAMA 36104

W WARNER FLOYD
EXECUTIVE DIRECTOR

TELEPHONE NUMBER
832-6621

August 15, 1978

Mr. John C. White
Regional Administrator
Environmental Protection Agency
EIS Branch
345 Courtland Street, N. E.
Atlanta, GA 30308

Dear Mr. White:

Based on documented reports prepared by Professional Archaeologist Noel Read Stowe, the Alabama Historical Commission, state historic preservation office, concurs that the development of Ideal Basic Industries, Inc. plant site at Perdue Hill, Monroe County, Alabama, will not effect any archaeological, historical, or architectural resources.

Sincerely,

W. Warner Floyd

W. Warner Floyd

APPROVED:

Milo B. Howard, Jr.

Milo B. Howard, Jr.
State Historic Preservation Officer